

EXHIBIT 26

RUTH V. BRIGGS

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<p>IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>---</p> <p>RUTH V. BRIGGS, : No. 16-cv-00248 Plaintiff : : vs. : : TEMPLE UNIVERSITY, : Defendant : --- Thursday, May 25, 2017 ---</p> <p>Videotaped deposition of RUTH V. BRIGGS, taken pursuant to notice, was held at the offices of Littler Mendelson, Three Parkway, 1601 Cherry Street, Suite 1400, Philadelphia, Pennsylvania 19102, beginning at 10:07 a.m., on the above date, before DEBRA ANNE GERSTEMEIER, Registered Professional Reporter and Notary Public of the Commonwealth of Pennsylvania.</p> <p>---</p> <p>ELITE LITIGATION SOLUTIONS, LLC 1518 Walnut Street, Suite 300 Philadelphia, Pennsylvania 19102 www.elitelit.com ~ (215) 563-3703</p>	<p>1 2 CONTENTS ----- 3 4 TESTIMONY OF: RUTH V. BRIGGS 5 Page Number 6 By: Ms. Fendell-Satinsky.....8, 520 7 By: Mr. Munshi.....510 8 9 EXHIBITS ----- 10 "D" DEPOSITION EXHIBIT NO. PAGE MARKED 11 1 Hire sheet 105 (TEMPLE0076-77) 12 2 HR Affirmative Action Authorization 110 (TEMPLE0078-80) 13 3 10/20/09 email 153 (TEMPLE0081-86) 14 4 12/31/12 email string 170 (TEMPLE UNIVERSITY (R.BRIGGS)-0000362-8) 15 5 Temple Rules of Conduct 175 (TEMPLE0148-164) 16 6 Temple discrimination memo 179 (BRIGGS 94-96) 17 7 12/18/12 email 205 (TEMPLE0000392) 18 8 1/25/13 email 212 (TEMPLE0000382) 19 9 11/9/11 Discipline report 214 (BRIGGS 23) 20 10 6/18/12 email string 238 (TEMPLE UNIVERSITY (R.BRIGGS)-0000318-9) 21 11 8/2/12 email string 244 (TEMPLE UNIVERSITY (R.BRIGGS)-0000150-5) 22 12 3/24/13 email 250 (TEMPLE0000571-5) 23 13 3/26/13 Discipline report 273 (BRIGGS 49) 24 14 11/20/13 email 288</p>
<p>Page 2</p> <p>1 2 APPEARANCES: 3 4 CONSOLE MATTIACCI LAW 5 BY: RAHUL MUNSHI, ESQUIRE 6 1525 Locust Street, 9th Floor 7 Philadelphia, Pennsylvania 19102 8 Telephone: (215) 545-7676 9 E-mail: munshi@consolelaw.com 10 --Representing the Plaintiff 11 12 LITTLER MENDELSON 13 BY: RACHEL FENDELL-SATINSKY, ESQUIRE 14 Three Parkway 15 1601 Cherry Street, Suite 1400 16 Philadelphia, Pennsylvania 19102 17 Telephone: (267) 402-3000 18 E-mail: rsatinsky@littler.com 19 --Representing the Defendant 20 21 ALSO PRESENT: 22 Fay R. Trachtenberg - Temple counsel 23 Keith Weidenauer & Rick Christian - Videographers 24</p>	<p>Page 4</p> <p>1 15 11/20/13 email string 290 (TEMPLE0000666-70) 2 16 1/20/14 discipline report 304 (TEMPLE0170) 3 17 4/3/14 email re resignation 320 (TEMPLE0088) 4 18 4/1/14 letter 322 (TEMPLE0171) 5 19 6/23/05 Employee Perform Develop Plan 344 (TEMPLE UNIVERSITY (R.BRIGGS)-0000224-234) 6 20 11/15/05 Employee Perform Develop Plan 346 (TEMPLE UNIVERSITY (R.BRIGGS)-0000235-42) 7 21 8/17/06 Employee Perform Develop Plan 348 (TEMPLE UNIVERSITY (R.BRIGGS)-0000243-251) 8 22 2/25/08 Employee Perform Develop Plan 349 (TEMPLE UNIVERSITY (R.BRIGGS)-0000252-258) 9 23 10/01/08 Employee Perform Develop Plan 351 (TEMPLE UNIVERSITY (R.BRIGGS)-0000259-264) 10 24 6/14/11 Employee Perform Develop Plan 352 (TEMPLE UNIVERSITY (R.BRIGGS)-0000265-70) 11 25 6/12/12 Employee Perform Develop Plan 353 (TEMPLE0137-142) 12 26 5/28/13 Employee Perform Develop Plan 354 (TEMPLE0143-146) 13 27 12/14/11 email 361 (TEMPLE UNIVERSITY (R.BRIGGS)-0000327-8) 14 28 Complaint 367 15 29 8/2/12 email string 382 (TEMPLE UNIVERSITY (R.BRIGGS)-0000210-2, 208) 16 30 9/9/12 email string 391 (BRIGGS 24-29) 17 31 11/2/12 email 400 (TEMPLE UNIVERSITY (R.BRIGGS)-0000202) 18 32 11/5/12 email string 402 (TEMPLE UNIVERSITY (R.BRIGGS)-0000199-200) 19 33 2/7/13 email 406 (Briggs 38) 20 34 2/8/13 email string 408 (TEMPLE UNIVERSITY (R.BRIGGS)-0000197-198) 21 35 2/11/13 email string 410 (TEMPLE0196-199) 22 36 4/25/13 email string 415 (BRIGGS 51-52) 23 37 6/26/13 email string 418 (BRIGGS 53-57) 24 38 8/8/13 email string 426</p>

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1	39	2/6/14 email (BRIGGS 69)	430	1	THE VIDEOGRAPHER: We are now
2	40	2/22/14 email (EEOC 0062-65)	432	2	on the record.
3	41	2/26/14 email (EEOC 0066)	438	3	My name is Keith Weidenauer.
4	42	2/25/14 email (TEMPLE0324)	441	4	I'm the videographer retained by
5	43	3/14/14 email string (BRIGGS 74-76)	443	5	Elite Litigation Solutions.
6	44	3/25/14 email string (BRIGGS 79-83)	450	6	This is a video deposition for
7	45	3/28/14 email string (EEOC 0067-71)	451	7	the United States District Court for
8	46	4/21/14 email string (TEMPLE0174-175)	455	8	the Eastern District of
9	47	Temple application list (BRIGGS 97-99)	484	9	Pennsylvania. Today's date is May
10	48	Briggs Resume (BRIGGS 1-22)	489	10	25th, 2017, and the video time is
11	49	Response to Interrogatories	504	11	10:07 a.m.
12				12	This deposition is being held
13				13	at Littler Mendelson in
14				14	Philadelphia, Pennsylvania in the
15				15	matter of Briggs vs Temple
16				16	University. The deponent is Ruth
17				17	Briggs.
18				18	All counsel will be noted on
19				19	the stenographic record.
20				20	The court reporter is Debbie
21				21	Gerstemeier, and will now swear in
22				22	the witness.
23				23	---
24				24	RUTH V. BRIGGS, having been
Page 6			Page 8		
1		DEPOSITION SUPPORT INDEX	1		duly sworn, was examined and testified
2		-----	2		as follows:
3			3		---
4		Direction to Witness Not to Answer	4		EXAMINATION
5		Page	5		---
6		None	6		BY MS. FENDELL-SATINSKY:
7			7		Q. Good morning, Ms. Briggs.
8		Request for Production of Documents	8		A. Good morning.
9		Page Line	9		Q. We met off the record, and for the
10		32 7	10		record, my name is Rachel Fendell-Satinsky.
11		258 6	11		I'm an attorney at Little Mendelson.
12		268 13	12		A. Okay.
13		297 21	13		Q. And myself and my colleague, Rich
14		472 24	14		Harris, we represent the Defendant, Temple
15		482 5	15		University --
16		Stipulations	16		A. Okay.
17		Page	17		Q. -- in the lawsuit that you've brought
18			18		against them.
19		Federal Rules	19		Today I'm going to refer to Temple
20			20		University as "Temple." Okay?
21		Question Marked	21		A. That's fine.
22		Page	22		Q. So you'll understand when I refer to
23		None	23		"Temple" that I'm referring to Temple
24			24		University, right?

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<p style="text-align: right;">Page 9</p> <p>1 A. Yes.</p> <p>2 Q. Have you ever been deposed before?</p> <p>3 A. No.</p> <p>4 Q. I'm going to give you some ground</p> <p>5 rules that will make things easier today for</p> <p>6 you, for me, and for the court reporter</p> <p>7 especially. Okay?</p> <p>8 A. Uh-huh.</p> <p>9 Q. So that's a good, good first way to</p> <p>10 start. All of your answers have to be</p> <p>11 verbal. You can't say "uh-huh" or</p> <p>12 "uh-uh" --</p> <p>13 A. Yes.</p> <p>14 Q. -- or shake your head "yes" or "no,"</p> <p>15 because the court reporter can't record that</p> <p>16 on the record. So can you keep all of your</p> <p>17 answers oral, please?</p> <p>18 A. Yes, I will.</p> <p>19 Q. I'm going to ask you questions, and</p> <p>20 you're going to give answers to my</p> <p>21 questions.</p> <p>22 A. Uh-huh, yes.</p> <p>23 Q. You've been sworn in by the court</p> <p>24 reporter today.</p>	<p style="text-align: right;">Page 11</p> <p>1 you questions and for you to give oral</p> <p>2 responses. And you're doing a great job --</p> <p>3 A. Yeah.</p> <p>4 Q. -- by giving oral responses.</p> <p>5 A. Okay.</p> <p>6 Q. Okay?</p> <p>7 A. I understand.</p> <p>8 Q. Although it's not normal</p> <p>9 conversation, please wait until I finish</p> <p>10 asking my question before you give your</p> <p>11 answer. You may know what I'm going to ask,</p> <p>12 but the court reporter can only take one of</p> <p>13 us speaking, take down one of us speaking at</p> <p>14 once. Okay?</p> <p>15 A. Yes.</p> <p>16 Q. If you don't hear my questions,</p> <p>17 please let me know. Okay?</p> <p>18 A. Yes.</p> <p>19 Q. If you need me to repeat a question,</p> <p>20 feel free to ask me to repeat a question.</p> <p>21 Okay?</p> <p>22 A. I will.</p> <p>23 Q. Feel free at any time to take a</p> <p>24 break. You're welcome to do that. The only</p>
<p style="text-align: right;">Page 10</p> <p>1 Do you understand that you're under</p> <p>2 oath?</p> <p>3 A. Yes, I do.</p> <p>4 Q. And do you understand what an oath</p> <p>5 is?</p> <p>6 A. Yes, I do.</p> <p>7 Q. Your answers are under the penalty of</p> <p>8 perjury today just as if we were in court,</p> <p>9 although we're in a conference room.</p> <p>10 Do you understand that?</p> <p>11 A. Yes, I do.</p> <p>12 Q. You must answer truthfully and</p> <p>13 completely.</p> <p>14 Do you understand that?</p> <p>15 A. Yes, I do.</p> <p>16 Q. I don't want you to guess today. If</p> <p>17 your only answer to my question would be a</p> <p>18 guess, please tell me that, but you can</p> <p>19 estimate.</p> <p>20 Do you understand the difference</p> <p>21 between a guess --</p> <p>22 A. Yes.</p> <p>23 Q. -- and an estimate?</p> <p>24 I am, as I mentioned, entitled to ask</p>	<p style="text-align: right;">Page 12</p> <p>1 thing I would ask is that if I have a</p> <p>2 question pending to you, you answer my</p> <p>3 question before you take the break.</p> <p>4 A. I understand.</p> <p>5 Q. Is there any reason you can't hear my</p> <p>6 questions?</p> <p>7 A. No.</p> <p>8 Q. Are you under the influence of any</p> <p>9 substance that affects your ability to</p> <p>10 testify truthfully?</p> <p>11 A. No.</p> <p>12 Q. Can you state and spell your full</p> <p>13 name for the record.</p> <p>14 A. Sure. It's Ruth, R-U-T-H, Virginia,</p> <p>15 V-I-R-G-I-N-I-A, Briggs, B --</p> <p>16 Q. And --</p> <p>17 A. Oh, just my --</p> <p>18 Q. Go ahead.</p> <p>19 A. B-R-I-G-G-S.</p> <p>20 Q. What is your current address?</p> <p>21 A. 1700 North 5th Street, Apartment 1B,</p> <p>22 as in boy, Philadelphia, PA 19122.</p> <p>23 Q. What is your date of birth?</p> <p>24 A. [REDACTED]</p>

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Page 13	Page 15
<p>1 Q. Have you ever used any name other 2 than "Ruth Briggs"? 3 A. I -- yes. 4 Q. And what are those? 5 A. Uhm, it was Fandek, my married name, 6 but I never really took it officially. 7 Q. And how do you spell "Fandek"? 8 A. F, as in Frank, A-N, as in Nancy, D, 9 as in David, E-K, as in kangaroo. 10 Q. Do you have an email address? 11 A. Yes, I do. 12 Q. And what is your email address? 13 A. It is rbriggs02@gmail.com. 14 Q. Have you ever declared bankruptcy? 15 A. No. 16 Q. Have you used email to communicate 17 about Temple or your lawsuit against the 18 university other than communications with 19 your attorney? 20 A. I don't understand the question. 21 Again? 22 Q. Sure. Have you used email to 23 communicate about Temple or your lawsuit 24 against Temple other than communications</p>	<p>1 Q. And who was that? 2 A. Uh, their names? 3 Q. Yes. 4 A. Be ready to spell some of these. 5 Uhm, graduate students Gang, G-A-N-G -- 6 G-A-N-G, last name W-A-N-G. He was a 7 graduate student, PhD candidate in our 8 department. 9 Q. Any other individuals at Temple 10 you've communicated with since the end of 11 your employment with Temple? 12 A. Can I ask a question? If they've 13 already graduated, does that count? Yeah, 14 okay. 15 Q. Sure. 16 A. All right. So then Avi Sill, A-V, as 17 in Victor, I. Last name is S, as in Sam, 18 I-L. He was -- had left. He was a PhD 19 candidate while I was there. 20 Q. Anyone other than the two individuals 21 you've mentioned who you've communicated 22 with since your employment ended at Temple 23 who are from Temple? 24 A. Who are from Temple? Uhm, Karen</p>
Page 14	Page 16
<p>1 you've had with your attorney? 2 MR. MUNSHI: Just objection to 3 form. 4 At any time? 5 MS. FENDELL-SATINSKY: At any 6 time. 7 THE WITNESS: To Temple, to 8 the -- my supervise -- is that what 9 you mean? 10 MS. FENDELL-SATINSKY: Sure. 11 So, let's take a step back. 12 BY MS. FENDELL-SATINSKY: 13 Q. At any time, did you use your 14 personal email address to communicate about 15 your employment at Temple? 16 A. To -- no, I did not, except for to 17 Rahul. 18 Q. Okay. At any time, did you use your 19 email to communicate with people at Temple? 20 A. Yes. 21 Q. Since you left Temple, have you used 22 your email to communicate with people at 23 Temple? 24 A. Yes.</p>	<p>1 Woods-Wilson. It's a hyphenated name, 2 Karen, and it's Woods, W-O-O-D-S, as in Sam, 3 hyphen, Wilson, W-I-L-S-O-N. 4 Q. Anyone else? 5 A. I'm thinking. Oh, uh, Judy Lennon. 6 She was the department secretary. 7 Q. Anyone else? 8 A. Not that I recall. Oh, one more. 9 Marjatta Lyyra. Do you want me to spell 10 that for you? 11 Q. Sure. 12 A. M, as in Mary, A-R-J-A-T-T-A. Last 13 name is L-Y-R-R-E (sic), professor in the 14 Physics Department. 15 Q. Anyone else? 16 A. Not that comes to mind. 17 Q. Ms. Lyyra -- 18 A. Lyyra, yeah, uh-huh. 19 Q. Lyyra. 20 A. It's "Dr." there. 21 Q. Doctor. What did you communicate 22 with her about? 23 A. Just she was asking me how I was 24 doing. Just general, you know, "I hope</p>

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<p>1 you're okay," "thinking about you." 2 Q. Did you communicate with her anything 3 about your lawsuit against Temple? 4 A. She knew that if -- no, no, not the 5 lawsuit, no. 6 Q. You started to say she knew 7 something. 8 A. About the EEOC. 9 Q. She -- she knew that you filed an 10 EEOC charge? 11 A. Yes. 12 Q. And how did she know that? 13 A. Because I told her. 14 Q. How did you tell her? 15 A. In a conversation at lunch one day. 16 Q. Do you have any email communications 17 with Dr. Lyra regarding your EEOC charge? 18 A. Yeah, I do. Oh, I don't think -- 19 about the EEOC? No, I don't think I -- no. 20 After I left was more, "How are you doing?" 21 Q. Have you reviewed your emails to see 22 whether you have communications with Ms. -- 23 with Dr. Lyra about your EEOC charge? 24 A. No, I have not.</p>	<p>1 A. Uh-huh. 2 Q. Who is Ms. Woods-Wilson? 3 A. She was my counterpart in Physics. 4 Q. What does that mean? 5 A. She was the assistant to the chair of 6 that department. 7 Q. And who was the chair of that 8 department? 9 A. At the time, it was Rongjia Tao, 10 R-O-N-J-A (sic). Last name is T-A-O. 11 Q. What did you communicate with Ms. 12 Woods-Wilson about following the end of your 13 employment at Temple? 14 A. More about how, "How are you doing," 15 "thinking about you," "let's have lunch" 16 or... 17 Q. Did you communicate with Ms. 18 Woods-Wilson about your lawsuit or your -- 19 A. She did -- 20 Q. -- EEOC charge? 21 A. -- know about it. 22 MR. MUNSHI: Just do your best 23 to wait until the question has been 24 asked.</p>
Page 18	Page 20
<p>1 Q. You also mentioned that you spoke 2 with Ms. Lennon? 3 A. Uh-huh. 4 Q. Is that a "yca"? 5 A. Yes. I'm sorry. 6 Q. That's okay. 7 What did you speak with Ms. Lennon 8 about? 9 A. Actually, she called me after I left. 10 Q. And -- 11 A. About just com -- about how to do 12 something in the department. 13 Q. Did you email with Ms. Lennon as 14 well? 15 A. Email and phone, uh-huh. 16 Q. Did you have any communication with 17 Ms. Lennon about your lawsuit against 18 Temple? 19 A. No, I did not. 20 Q. Did you have any communication with 21 Ms. Lennon about your EEOC charge? 22 A. No. 23 Q. You also mentioned Karen 24 Woods-Wilson?</p>	<p>1 THE WITNESS: I'm sorry. 2 MR. MUNSHI: That's okay. 3 Everyone does it. It's okay. 4 THE WITNESS: Yes. 5 MS. FENDELL-SATINSKY: That's 6 okay. I'll ask the question again 7 just so the record is clean. 8 BY MS. FENDELL-SATINSKY: 9 Q. Did you have any communications with 10 Ms. Woods-Wilson about your EEOC charge or 11 your lawsuit against Temple? 12 A. Yes, I did. 13 Q. And what conversations did you have 14 with her? 15 A. Just confirming that, told her that I 16 had followed through on that. 17 Q. What did you tell her specifically? 18 A. That I had gone to the EEOC and that 19 I had met with Sandy Foehl to file an 20 internal. 21 Q. Did you tell her anything else about 22 your lawsuit against Temple or your EEOC 23 charge? 24 A. I know that she -- I told her that I</p>

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<p style="text-align: right;">Page 21</p> <p>1 saw an attorney. I think that's about as 2 far as it went. 3 Q. The conversations you reference, were 4 those oral or written? 5 A. They were both. 6 Q. The written communications you had, 7 were those on your personal email account? 8 A. It could have been both. 9 Q. And when you say both, you mean both 10 personal and your Temple email account? 11 A. Before I left Temple, right. 12 Q. Have you reviewed your emails to 13 determine whether you have any 14 communications on your personal email with 15 Ms. Woods-Wilson about your lawsuit against 16 Temple or your EEOC charge? 17 A. No, I have not. 18 Q. Have you had any other communications 19 with Ms. Woods-Wilson about your lawsuit 20 against Temple or your EEOC charge other 21 than what you've already told me? 22 A. No, I don't. 23 Q. You also mentioned that you've spoken 24 with a former student name Avi Sill?</p>	<p style="text-align: right;">Page 23</p> <p>1 Facebook Messenger? 2 A. Yes. 3 Q. And did he contact you through the 4 Facebook Messenger after your employment 5 ended at Temple? 6 A. Yes. 7 Q. Did you communicate -- or let me ask 8 a better question. 9 Did you respond to Avi after he sent 10 you an initial message? 11 A. Yes. 12 Q. And did you have further exchange 13 with Avi other than a response to his 14 original -- 15 A. Yes. 16 Q. -- message? 17 What did you speak with him about? 18 A. About his new job. He told me that 19 he missed his American mother. Uhm, just 20 gen -- it wasn't nothing. That was it. 21 Q. Did you tell him that your employment 22 with Temple had ended? 23 A. When it did, I said that I'm no 24 longer with them.</p>
<p style="text-align: right;">Page 22</p> <p>1 A. Uh-huh. 2 Q. And what did you -- 3 MR. MUNSHI: Just verbalize. 4 THE WITNESS: "Yes." 5 BY MS. FENDELL-SATINSKY: 6 Q. What did you speak with Avi Sill 7 about? 8 A. Just about his new job was. Just -- 9 he didn't even know. I think he thought I 10 was still there. 11 Q. Did you reach out to him or did he 12 reach out to you? 13 A. He reached out to me. 14 MR. MUNSHI: Sorry. Just do 15 the best you can to wait. Even 16 though you know where she's going 17 with it, just do the best you can. 18 It's okay. 19 THE WITNESS: Okay. 20 BY MS. FENDELL-SATINSKY: 21 Q. How did he have your personal email 22 address? 23 A. It was through Facebook, actually. 24 Q. Did he contact you through the</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. How many conversations did you have 2 with Avi Sill over Facebook Messenger? 3 A. On pretty regular -- like, maybe 4 every three or four months, I'd say. 5 Q. Do you still communicate with Avi 6 Sill? 7 A. Uh-huh, I do. 8 Q. On Facebook Messenger? 9 A. Yes. 10 Q. Have you also communicated with Avi 11 Sill on email? 12 A. I -- no, I don't -- my personal, 13 you're talking about. No. 14 Q. Have you had any communications with 15 Avi Sill about your EEOC charge or your 16 litigation -- 17 A. No, I have not. 18 Q. -- against Temple? Just wait until I 19 finish asking my question. 20 A. Sorry. 21 Q. That's okay. 22 A. Try -- 23 Q. Have you had any communications with 24 Avi Sill about your EEOC charge or your</p>

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<p>1 lawsuit against Temple?</p> <p>2 A. No, I have not.</p> <p>3 Q. Finally, you mentioned a grad student</p> <p>4 who's last name was Wang?</p> <p>5 A. Wang, yes, uh-huh.</p> <p>6 Q. Is that correct?</p> <p>7 A. Gang Wang, right.</p> <p>8 Q. "Wang."</p> <p>9 A. It's still A-N-G.</p> <p>10 Q. A-N-G, but sounded like "Wong."</p> <p>11 A. "Gong Wong."</p> <p>12 Q. Understood.</p> <p>13 And what did you speak with him about</p> <p>14 following the end of your employment at</p> <p>15 Temple?</p> <p>16 A. About his passing his English</p> <p>17 proficiency.</p> <p>18 Q. Did he reach out to you?</p> <p>19 A. Yes.</p> <p>20 Q. By email?</p> <p>21 A. Through Facebook.</p> <p>22 Q. Was that Facebook Messenger as well?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Is that a "yes"?</p>	<p>1 Q. And where was that meeting?</p> <p>2 A. It was in the Starbucks on Temple's</p> <p>3 campus.</p> <p>4 Q. Did that meeting occur while you were</p> <p>5 still working at Temple?</p> <p>6 A. No.</p> <p>7 Q. Other than people we've talked about,</p> <p>8 have you communicated with anyone who worked</p> <p>9 or went to school at Temple following the</p> <p>10 end of your employment at Temple?</p> <p>11 A. There was another graduate student,</p> <p>12 Nemanja. Let me spell that for you.</p> <p>13 N-E-M-A-N -- wait a minute. I have to spell</p> <p>14 it. Can I use your pen?</p> <p>15 Q. That's okay. We can --</p> <p>16 A. Okay.</p> <p>17 Q. We can do it after.</p> <p>18 A. I can -- let me spell his last name.</p> <p>19 I know it.</p> <p>20 Q. Sure.</p> <p>21 A. It's D, as in David, J-U-R-I-C.</p> <p>22 Q. And did he reach out to you or did</p> <p>23 you reach out to him?</p> <p>24 A. He reached out to me.</p>
Page 26	Page 28
<p>1 A. Yes. I'm sorry.</p> <p>2 Q. It's okay.</p> <p>3 Did you respond to his initial</p> <p>4 communication?</p> <p>5 A. Yes, I did.</p> <p>6 Q. Have you continued to communicate</p> <p>7 with him?</p> <p>8 A. No.</p> <p>9 Q. So the only communication you had</p> <p>10 with him was a message he sent you and a</p> <p>11 response to that message by you?</p> <p>12 A. There -- there could have been more</p> <p>13 than one. It was setting up a date to meet</p> <p>14 with him.</p> <p>15 Q. What was the meeting for?</p> <p>16 A. To help him just to talk in</p> <p>17 conversational English, just to practice</p> <p>18 English.</p> <p>19 Q. Did you meet with him?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Is that a "yes"?</p> <p>22 A. Yes, it is. Yeah, "yes."</p> <p>23 Q. How many times did you meet with him?</p> <p>24 A. One time.</p>	<p>1 Q. How did he reach out to you?</p> <p>2 A. About a soccer game through Facebook.</p> <p>3 Q. Facebook --</p> <p>4 A. Uh-huh.</p> <p>5 Q. -- Messenger?</p> <p>6 A. Uh-huh, yeah.</p> <p>7 Q. What about a soccer game?</p> <p>8 A. About an -- he works for Google,</p> <p>9 about their team.</p> <p>10 Q. Did you respond to him?</p> <p>11 A. Yes, I did.</p> <p>12 Q. And aside from his initial contact</p> <p>13 and your response, did you have any other</p> <p>14 communications with him?</p> <p>15 A. I could have. Yes, yes.</p> <p>16 Q. Did you tell him that your employment</p> <p>17 at Temple ended?</p> <p>18 A. Yes.</p> <p>19 Q. Have you talked to him about your</p> <p>20 EEOC charge or your lawsuit against Temple?</p> <p>21 A. No, I have not.</p> <p>22 Q. Other than the people we've spoken</p> <p>23 about, is there anyone else who worked or</p> <p>24 went to school at Temple that you've spoken</p>

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<p style="text-align: right;">Page 29</p> <p>1 with since the end of your employment at 2 Temple? 3 A. No. That come -- no. 4 Q. The Facebook messages that you've 5 referenced, do you still have those 6 messages? 7 A. Probably. I haven't looked at them, 8 but I would say, yes. 9 Q. We've spoken a little bit about 10 Facebook. 11 When did you open your Facebook 12 account? 13 A. I don't know the answer to that 14 question. 15 Q. Did you open your Facebook account 16 while you worked at Temple? 17 A. Yes. 18 MS. FENDELL-SATINSKY: Can we 19 go off the record for a moment, 20 please. 21 THE VIDEOGRAPHER: Going off 22 the record, 10:25. 23 --- 24 (Whereupon, a brief pause was</p>	<p style="text-align: right;">Page 31</p> <p>1 work at Temple on your Facebook page? 2 A. About my -- could you? 3 Q. Sure. Have you posted on Facebook 4 anything about your work at Temple? 5 A. Yeah. 6 Q. What have you posted about? 7 A. Well, when I would do things for the 8 college and would post about graduation or 9 award ceremonies or -- while I worked there. 10 Q. Would you post those things on your 11 personal Facebook account? 12 A. We had a department page, but it 13 wasn't -- it was like a private group, so it 14 would be through there. 15 Q. Did you post anything on your 16 personal Facebook account about your 17 employment at Temple? 18 A. Yes. 19 Q. What did you post on your personal 20 Facebook account -- 21 A. About -- 22 Q. -- about your employment at Temple? 23 A. About students or an event or... 24 Q. Anything else?</p>
<p style="text-align: right;">Page 30</p> <p>1 taken from 10:25 until 10:26 a.m.) 2 --- 3 THE VIDEOGRAPHER: Going back 4 on the record, 10:26. 5 MS. FENDELL-SATINSKY: Can you 6 repeat the last question? 7 THE COURT REPORTER: I can't 8 read it now after it shut off. 9 MS. FENDELL-SATINSKY: Okay. 10 BY MS. FENDELL-SATINSKY: 11 Q. We were speaking about Facebook 12 before we went off the record, correct? 13 A. That's correct. 14 Q. And I asked you when you opened your 15 Facebook account, and you told me it was 16 while you were working at Temple, correct? 17 A. Yes. 18 Q. Are you -- other than the people that 19 we've spoken about already, are you 20 connecting with anyone else who worked or 21 went to school at Temple on your Facebook 22 page? 23 A. Yes. 24 Q. Have you posted anything about your</p>	<p style="text-align: right;">Page 32</p> <p>1 A. Graduation. Mostly about events, I 2 would say. 3 Q. Have you posted anything on Facebook 4 about your EEOC charge or your lawsuit 5 against Temple? 6 A. No, I have not. 7 MS. FENDELL-SATINSKY: And, 8 Rahul, we can do this at the end, 9 but I'll just put on the record that 10 we don't have any of these Facebook 11 Messenger exchanges or Facebook 12 posts about Temple, which would be 13 responsive to the requests. 14 MR. MUNSHI: We'll talk about 15 it. I mean, she just testified as 16 to the communications, and nothing 17 had to do with the EEOC charge or 18 the complaint that she filed or the 19 lawsuit; so we can have a 20 conversation as to what actually is 21 responsive and relevant. 22 MS. FENDELL-SATINSKY: Sure. 23 She also testified that she posted 24 about the end of her employment, but</p>

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<p>1 we can definitely discuss that off</p> <p>2 the record.</p> <p>3 MR. MUNSHI: About the end of</p> <p>4 her employment? I don't think she</p> <p>5 ever said that.</p> <p>6 THE WITNESS: I didn't.</p> <p>7 BY MS. FENDELL-SATINSKY:</p> <p>8 Q. You told me earlier that you posted</p> <p>9 at Temple, you had communications on</p> <p>10 Facebook Messenger regarding the end of your</p> <p>11 employment with Temple, correct?</p> <p>12 A. Right.</p> <p>13 MR. MUNSHI: You said</p> <p>14 "posted."</p> <p>15 BY MS. FENDELL-SATINSKY:</p> <p>16 Q. Do you have an Instagram account?</p> <p>17 A. I do.</p> <p>18 Q. Have you posted anything on Instagram</p> <p>19 about your employment at Temple?</p> <p>20 A. No, I have not.</p> <p>21 Q. Do you use LinkedIn?</p> <p>22 A. Yes.</p> <p>23 Q. Have you posted anything about your</p> <p>24 employment at Temple on LinkedIn?</p>	<p>1 today with all four of your children?</p> <p>2 A. No. My daughters.</p> <p>3 Q. Your daughters?</p> <p>4 A. Uh-huh.</p> <p>5 Q. How many daughters do you have?</p> <p>6 A. Two.</p> <p>7 Q. And what are their names?</p> <p>8 A. Anne Elizabeth, and she's --</p> <p>9 Q. And --</p> <p>10 A. Oh, Briggs-Fandek. I'm sorry.</p> <p>11 Q. Okay.</p> <p>12 A. Briggs, hyphen, Fandek.</p> <p>13 Q. And?</p> <p>14 A. And Abigail Briggs-Fandek.</p> <p>15 Q. Did you speak with them together or</p> <p>16 separately?</p> <p>17 A. Separately.</p> <p>18 Q. And your communications with them,</p> <p>19 were they by phone, in-person, email, some</p> <p>20 other method?</p> <p>21 A. By phone and text message.</p> <p>22 Q. Did you speak with both of them by</p> <p>23 phone?</p> <p>24 A. Just -- no.</p>
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<p>1 A. That I worked there. It was on my</p> <p>2 resumé.</p> <p>3 Q. Anything else?</p> <p>4 A. No.</p> <p>5 Q. Have you posted on -- anything on</p> <p>6 LinkedIn about the end of your employment at</p> <p>7 Temple?</p> <p>8 A. No; unless my resumé counts. I'm</p> <p>9 sorry.</p> <p>10 Q. And what did you do on your resumé to</p> <p>11 indicate that your employment at Temple</p> <p>12 ended?</p> <p>13 A. I just put the date of term -- of</p> <p>14 separation.</p> <p>15 Q. What was that?</p> <p>16 A. April 1st, 2014.</p> <p>17 Q. Anything else?</p> <p>18 A. No.</p> <p>19 Q. Did you discuss your deposition today</p> <p>20 with anyone other than your attorney?</p> <p>21 A. My adult children.</p> <p>22 Q. How many children do you have?</p> <p>23 A. Four.</p> <p>24 Q. And did you discuss your deposition</p>	<p>1 Q. Who did you speak with by phone --</p> <p>2 A. Abigail.</p> <p>3 Q. -- about your deposition?</p> <p>4 A. Abigail.</p> <p>5 Q. Just wait until I finish asking --</p> <p>6 A. Okay.</p> <p>7 Q. -- my question, even though you might</p> <p>8 know what I'm going to ask.</p> <p>9 And so you did not speak with Anne by</p> <p>10 phone about your deposition?</p> <p>11 A. Not by phone, no.</p> <p>12 Q. Did you speak with Anne by text</p> <p>13 message --</p> <p>14 A. Yes.</p> <p>15 Q. -- about your deposition?</p> <p>16 What did you tell Abigail about your</p> <p>17 deposition?</p> <p>18 A. That I couldn't watch her children;</p> <p>19 that today was my deposition, pretty much.</p> <p>20 Q. Did you tell her anything else about</p> <p>21 your deposition?</p> <p>22 A. That I was nervous.</p> <p>23 Q. Anything else?</p> <p>24 A. No.</p>

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<p>1 Q. Did she ask you anything about your 2 deposition? 3 A. No. 4 Q. You said you communicated with Anne 5 by text message about your deposition. 6 A. Uh-huh. 7 Q. Is that a "yes"? 8 A. Yes. I'm sorry. 9 Q. What did you communicate with Anne 10 about regarding your deposition? 11 A. That I'd have to get back to her 12 about wedding flowers that I was -- this 13 week. Basically, that I had something that 14 was big. 15 Q. Did you tell her you had a 16 deposition? 17 A. Yes. 18 Q. Did you tell her anything else about 19 your deposition? 20 A. No. 21 Q. Did you tell her how you felt about 22 your deposition? 23 A. I did. 24 Q. What did you tell her about how you</p>	<p>1 A. I'm not sure I under -- that I had, 2 that I had -- that I, that I had filed a 3 written complaint, is that what you're 4 saying? 5 Q. Sure. 6 A. Okay. 7 Q. So let me -- 8 A. Okay, I get -- 9 Q. -- ask my question differently. 10 A. All right. 11 Q. You have two other children -- 12 A. Uh-huh. 13 Q. -- in addition to Abigail and Anne, 14 correct? 15 A. Yes. 16 Q. And what are their names? 17 A. Gabriel Briggs-Fandek and Zachary 18 Briggs-Fandek. 19 Q. How have you communicated with 20 Gabriel about your EEOC charge or your 21 lawsuit against Temple? 22 A. Orally. 23 Q. And what have you told Gabriel about 24 your lawsuit or your EEOC charge against</p>
Page 38	Page 40
<p>1 felt? 2 A. I was nervous. 3 Q. Did you tell her anything else about 4 your deposition? 5 A. No. 6 Q. You have two other children in 7 addition to Abigail and Anne -- 8 A. Yes. 9 Q. -- correct? 10 A. Yes. 11 Q. Are they aware that you filed a 12 lawsuit against Temple? 13 A. Yes. 14 Q. Have you communicated with them about 15 your EEOC charge or your lawsuit against 16 Temple in written form? 17 A. Did I write to them? 18 Q. Did you have any conversations with 19 your two other children -- 20 A. Oh, yes. 21 Q. -- regarding your EEOC charge or your 22 lawsuit against Temple in written form? 23 A. Yes. 24 Q. In what kind of written form?</p>	<p>1 Temple? 2 A. He is aware that I filed the charge 3 with the EEOC. 4 Q. What did you tell him? 5 A. That I filed it because of 6 discrimination. 7 Q. Did you tell him anything else about 8 your EEOC charge or your lawsuit against 9 Temple? 10 A. Prob -- yes. 11 Q. What else? 12 A. Over the -- I don't know how to 13 answer that. Uhm, he would -- we would talk 14 about it. I mean, no specifics, because he 15 wasn't really interested, but I would say -- 16 he would, "So how's that going, Ma?" 17 And I'd say, "It's going. I'm still 18 working on it. Nothing has come out of it 19 yet." 20 Q. When you say nothing has come out of 21 it yet, what do you mean? 22 A. He would ask me where, where are we, 23 you know, where are you in the process, have 24 you withdrawn it, you haven't talked about</p>

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<p style="text-align: right;">Page 41</p> <p>1 it, something like that. And I would say, 2 no, it's still in process. 3 MS. FENDELL-SATINSKY: Can you 4 read back her prior answer to the 5 second to last question, please. 6 THE COURT REPORTER: Okay. 7 "And I'd say, 'It's going. I'm 8 still working on it. Nothing has 9 come out of it yet,'" that one? 10 MS. FENDELL-SATINSKY: Yes. 11 Thank you. 12 THE COURT REPORTER: Uh-huh. 13 BY MS. FENDELL-SATINSKY: 14 Q. You said that you've told Gabriel 15 nothing has come out of your lawsuit, 16 correct? 17 A. I was talking about the EEOC thing. 18 Q. So I want to know, when you said to 19 him nothing has come out of your lawsuit, 20 what you meant by that. 21 A. I meant that they sent me a letter 22 saying they found no grounds for 23 discrimination. 24 Q. Anything else?</p>	<p style="text-align: right;">Page 43</p> <p>1 A. That I got from the EEOC saying that 2 they found no grounds and that they -- I was 3 being re -- I don't know what the term is, 4 released or -- I don't know what the term 5 is. 6 Q. Have you had any written 7 communications with Gabriel about your 8 lawsuit? 9 A. No, I have not. 10 Q. Have you had any written 11 communications with Zachary about your 12 lawsuit? 13 A. No, I have not. 14 Q. What did you communicate with Zachary 15 about your lawsuit? 16 A. That I'd -- he knew about the EEOC 17 thing. He knows that this is in litigation 18 now, but -- and that's about it. 19 Q. What did you tell him about the EEOC 20 thing? 21 A. That I -- the whole thing? That -- 22 Q. So, you told me that you told 23 Gabriel -- 24 A. Zach.</p>
<p style="text-align: right;">Page 42</p> <p>1 A. He knew -- he knows about the 2 lawsuit, the lawsuit, yes. 3 Q. So when you referred to speaking with 4 Gabriel and saying that nothing has come out 5 of the lawsuit yet, you said that you meant 6 that the EEOC said there's no grounds for 7 discrimination, correct? 8 A. I didn't -- no. That's not true. 9 Q. Okay. So -- 10 A. The answer -- okay. 11 Q. So if that's not true, I want to 12 know, when you said to him that nothing has 13 come out of the lawsuit, what you meant by 14 that. 15 A. Nothing has come out of the EEOC -- 16 Q. And what -- 17 A. -- grievance. That's what I said to 18 him. I didn't -- the lawsuit, I haven't 19 talked to him about that. 20 Q. When you said nothing has come out of 21 the EEOC grievance, what did you mean by 22 that? 23 A. The letter. 24 Q. What letter?</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. You told Zachary, my apologies, 2 orally. Let me step back. 3 You testified that Zachary knew about 4 the EEOC thing, correct? 5 A. Correct. 6 Q. So I want to know what you told him 7 about the EEOC thing. 8 A. That I had gone to them and filed it 9 and that I had filed internally too, 10 internally with Temple, their officer, 11 Sandy Foehl. 12 Q. And then you said that Zachary knows 13 that you're in litigation? 14 A. Yes. 15 Q. What did you tell him about you being 16 in litigation? 17 A. That I'm in litigation. 18 Q. Anything else? 19 A. No. 20 Q. Other than the text messages with 21 Anne that you told me about already, have 22 you had any written communications with Anne 23 about your lawsuit against Temple? 24 A. No.</p>

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<p style="text-align: right;">Page 45</p> <p>1 Q. Have you had any written 2 communications with Abigail about your 3 lawsuit against Temple? 4 A. No. 5 Q. Other than the people that we've 6 spoken about, have you spoken with anyone 7 else about your lawsuit against Temple? 8 MR. MUNSHI: Besides me. 9 MS. FENDELL-SATINSKY: And I 10 don't want to know today anything 11 that you have spoken with Mr. Munshi 12 or any other attorneys about. 13 THE WITNESS: Okay. 14 BY MS. FENDELL-SATINSKY: 15 Q. So other than Mr. Munshi or any other 16 attorneys, have you communicated with anyone 17 other than the people we've talked about 18 already about your lawsuit against Temple? 19 A. Yes. 20 Q. Who? 21 A. Keya Sadeghipour, and he is the dean 22 of the College of Engineering. I can spell 23 his name. 24 MR. MUNSHI: Yeah, you might</p>	<p style="text-align: right;">Page 47</p> <p>1 Temple about your lawsuit against Temple 2 other than the people we've talked about? 3 A. No. 4 Q. The dean of engineering, what did you 5 speak with him about following the end of 6 your employment at Temple? 7 A. About a letter of recommendation. 8 Q. How did you -- did you reach out to 9 ask him for a letter of recommendation? 10 A. Yes, I did. 11 Q. How did you reach out to him? 12 A. By email. 13 Q. Did he respond to your email? 14 A. Yes, he did. 15 Q. And what did he say? 16 A. He said he would be happy to provide 17 one. 18 Q. Did he provide one for you? 19 A. I didn't need one, but, yeah, no, he 20 did not. 21 Q. The communication you had with him, 22 was that on your personal email account? 23 A. I don't know for sure. 24 Q. You haven't checked; is that correct?</p>
<p style="text-align: right;">Page 46</p> <p>1 have to do that. 2 THE WITNESS: Do you want me, 3 do you want me to spell it? 4 MS. FENDELL-SATINSKY: We can 5 do it off the record. 6 THE WITNESS: Okay. 7 BY MS. FENDELL-SATINSKY: 8 Q. Anyone else? 9 A. Can I -- did you ask me if I talked 10 to him about the lawsuit or if I've spoken 11 to him since I've left? I can't -- 12 Q. So, right now my question was: Have 13 you spoken, other than Mr. Munshi, with 14 anyone other than the people we've talked 15 about about your lawsuit against Temple? 16 A. No, no. 17 Q. So you spoke with the dean of 18 engineering since you've left Temple? 19 A. Yes. 20 Q. Have you spoken with anyone else 21 other than the people who we've talked about 22 since you've left Temple? 23 Let me ask you a better question. 24 Have you spoken with anyone who worked at</p>	<p style="text-align: right;">Page 48</p> <p>1 A. No, I haven't checked. 2 Q. And just to close the loop on it, 3 other than the people we've already talked 4 about, is there anyone else who worked at 5 Temple that you've spoken to about -- is 6 there anyone else -- let's start from the 7 beginning. 8 Other than the people that we've 9 already talked about, is there anyone else 10 who worked at Temple who you have spoken to 11 since the end of your employment at Temple? 12 A. Not that I can recall. I think I've 13 been exhausted. 14 Q. You said that you asked the dean of 15 engineering for a letter of recommendation 16 and ultimately did not need it, correct? 17 A. Correct. 18 Q. Why did you not need the letter of 19 recommendation? 20 A. Because I didn't get any job offers. 21 Q. Have you been asked at any time since 22 the end of your employment at Temple for a 23 letter of recommendation? 24 A. No, I have not.</p>

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<p>1 Q. Have you been asked at any time since 2 the end of your employment at Temple for a 3 reference? 4 MR. MUNSHI: I'm sorry. Did 5 she ask somebody or did someone ask 6 her? 7 BY MS. FENDELL-SATINSKY: 8 Q. Have you been asked at any time since 9 the end of your employment for a reference? 10 A. I've -- yes. On job applications. 11 Q. Have you listed anyone who worked at 12 Temple as a reference on any job 13 application? 14 A. Yes. 15 Q. Who? 16 A. Keya Sadeghipour, Marjatta Lyyra, 17 Shohreh Amini, Frank Friedman, Allen 18 Nicholson, and Bruce Conrad. 19 Q. Who is Shohreh Amini? 20 A. She's a professor in the College of 21 Science and Technology in the Department of 22 Biology. 23 Q. Did you ask her to serve as a 24 reference for you?</p>	<p>1 Q. Did he agree to serve as a reference 2 for you? 3 A. Yes. 4 Q. Did Shohreh Amini agree to serve as a 5 reference? 6 A. Yes. 7 Q. Who is Aaron (sic) Nicholson? 8 A. Allen. 9 Q. Allen? 10 A. Allen, yeah. 11 Q. My apologies. 12 A. Uhm, he is a professor in the 13 Department of Biology and Biochem. He might 14 still be the chair of biology, I'm not sure. 15 Q. Did you ask him orally or in writing 16 to serve as a reference for you? 17 A. I believe I emailed him. 18 Q. Did you email him while you still 19 worked at Temple? 20 A. Yes, I did. 21 Q. Did he agree to serve as a reference 22 for you? 23 A. Yes, he did. 24 Q. Who is Bruce Conrad?</p>
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<p>1 A. I did. 2 Q. How did you ask her? 3 A. I asked her if I could use her name 4 just for a reference. 5 Q. Did you ask her by email? 6 A. No. I asked her it orally. 7 Q. And where did you ask her orally? 8 A. In the office, in her office. 9 Q. Did you ask her to serve as a 10 reference for you prior to the end of your 11 employment at Temple? 12 A. Yes, yeah. 13 Q. Who is Frank Friedman? 14 A. He is a -- well, he's a professor 15 emeritus now from the Department of Computer 16 and Information Sciences. 17 Q. Did you ask him by email to serve as 18 a reference for you? 19 A. I asked him orally. No, I asked him 20 orally. 21 Q. Did you ask him orally to serve as a 22 reference for you prior to the end of your 23 employment at Temple? 24 A. Yes, I did.</p>	<p>1 A. Uhm, he's -- was a profess -- he was 2 a professor for math, but he worked in the 3 dean's office as the coord -- the director 4 of undergraduate studies in the College of 5 Science and Technology. 6 Q. Did you ask him orally to serve as a 7 reference for you? 8 A. Yes. 9 Q. Did you ask him while you were still 10 working at Temple -- 11 A. Yes. 12 Q. Let me just finish my question. 13 A. Oh, I'm sorry. 14 Q. That's okay. 15 Did you ask him before the end of 16 your employment at Temple to serve as a 17 reference for you? 18 A. Yes, I did. 19 Q. Do you know if any -- let me strike 20 that. 21 Do you know if Kiera -- if Keya, the 22 dean of engineering, Marjatta Lyyra, Shohreh 23 Amini, Frank Friedman, Allen Nicholson, or 24 Bruce Conrad has been called as a reference</p>

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<p>1 for you?</p> <p>2 A. I don't know.</p> <p>3 MR. MUNSHI: At any time?</p> <p>4 BY MS. FENDELL-SATINSKY:</p> <p>5 Q. Since you've asked Keya, Marjatta</p> <p>6 Lyyra, Shohreh Amini, Frank Friedman, Allen</p> <p>7 Nicholson, and Bruce Conrad to serve as</p> <p>8 references for you, do you know if any of</p> <p>9 them have been contacted as a reference for</p> <p>10 you?</p> <p>11 A. I don't know the answer to that</p> <p>12 question.</p> <p>13 Q. You also, uh, mentioned Marjatta</p> <p>14 Lyyra?</p> <p>15 A. Uh-huh.</p> <p>16 Q. Yes?</p> <p>17 A. Yes, I did.</p> <p>18 Q. I know we spoke about her earlier.</p> <p>19 How did you ask her to serve as a</p> <p>20 reference for you?</p> <p>21 A. I asked her if it was okay if I put</p> <p>22 her down as a reference.</p> <p>23 Q. Did you ask her orally?</p> <p>24 A. Yes.</p>	<p>1 Q. Before, you told me that you only</p> <p>2 asked Marjatta Lyyra to serve as a reference</p> <p>3 for you prior to the end of your employment</p> <p>4 at Temple.</p> <p>5 MR. MUNSHI: Objection to</p> <p>6 form.</p> <p>7 BY MS. FENDELL-SATINSKY:</p> <p>8 Q. Did you ask Ms. Lyyra to serve as a</p> <p>9 reference for you after the end of your</p> <p>10 employment at Temple as well?</p> <p>11 A. Yes.</p> <p>12 Q. How did you ask her to serve as a</p> <p>13 reference for you after the end of your</p> <p>14 employment at Temple?</p> <p>15 A. By email and -- go ahead.</p> <p>16 Q. Go ahead.</p> <p>17 A. For a letter --</p> <p>18 Q. It sounded --</p> <p>19 A. -- for a job I applied.</p> <p>20 Q. What job?</p> <p>21 A. It was at the Community College of</p> <p>22 Philadelphia in the dean's office.</p> <p>23 Q. Did you send her an email from your</p> <p>24 personal email address?</p>
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<p>1 Q. Did you ask her prior to the end of</p> <p>2 your employment at Temple?</p> <p>3 A. Yes.</p> <p>4 Q. When did you ask Marjatta Lyyra to</p> <p>5 serve as a reference for you?</p> <p>6 A. I'm going to have to give</p> <p>7 approximates. 2009 --</p> <p>8 Q. Did you ask --</p> <p>9 A. -- ish.</p> <p>10 Q. I'm sorry. It sounded like I cut you</p> <p>11 off.</p> <p>12 A. "Ish."</p> <p>13 Q. Did you ask her anytime other than</p> <p>14 2009 to serve as a reference for you?</p> <p>15 A. Yes, I did.</p> <p>16 Q. When?</p> <p>17 A. In June of 2014.</p> <p>18 Q. That was after the end of your</p> <p>19 employment --</p> <p>20 A. Yes, it was.</p> <p>21 Q. -- at Temple --</p> <p>22 A. Yes.</p> <p>23 Q. -- correct?</p> <p>24 A. Uh-huh.</p>	<p>1 A. It could have been from Temple. It</p> <p>2 was still open.</p> <p>3 Q. How long was your email at Temple</p> <p>4 open following the end of your employment at</p> <p>5 Temple?</p> <p>6 A. Six to seven months.</p> <p>7 Q. Do you know why it was open?</p> <p>8 A. Uhm, no, I don't.</p> <p>9 Q. Did you continue to access your</p> <p>10 Temple email following the end of your</p> <p>11 employment with Temple?</p> <p>12 A. Yeah. Yes, I did.</p> <p>13 Q. Did Ms. Lyyra respond to your email?</p> <p>14 A. Yes.</p> <p>15 Q. Shohreh Amini, when did you ask her</p> <p>16 to serve as a reference for you?</p> <p>17 A. Probably around 2005, '06.</p> <p>18 Q. Any other time?</p> <p>19 A. Yes.</p> <p>20 Q. When?</p> <p>21 A. I'm going to say 2010-ish.</p> <p>22 Q. Any other time?</p> <p>23 A. Not that I recall.</p> <p>24 Q. When did you ask Frank Friedman to</p>

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<p>1 serve as a reference for you?</p> <p>2 A. 2010. Approximately 2000 -- yeah.</p> <p>3 Q. Did you ask him to serve as a</p> <p>4 reference for you any other time?</p> <p>5 A. No, I have not.</p> <p>6 Q. When did you ask Allen Nicholson to</p> <p>7 serve as a reference for you?</p> <p>8 A. I'm going -- 2004, '05-ish.</p> <p>9 Q. Did you ask Allen Nicholson to serve</p> <p>10 as a reference for you anytime other than</p> <p>11 around 2004, 2005?</p> <p>12 A. No.</p> <p>13 Q. When did you ask Bruce Conrad to</p> <p>14 serve as a reference for you?</p> <p>15 A. Around the same time, 2004, '05.</p> <p>16 Q. Did you ask Bruce Conrad to serve as</p> <p>17 a reference for you anytime other than 2004</p> <p>18 to 2005?</p> <p>19 A. No, I did not.</p> <p>20 Q. Why did you ask -- let me ask you a</p> <p>21 different question.</p> <p>22 When did you ask Keya, the dean of</p> <p>23 engineering, to serve as a reference for</p> <p>24 you?</p>	<p>1 you can. We don't want you</p> <p>2 guessing.</p> <p>3 THE WITNESS: It would be a</p> <p>4 guess.</p> <p>5 BY MS. FENDELL-SATINSKY:</p> <p>6 Q. Did you apply for more than five jobs</p> <p>7 in 2010 internally at Temple?</p> <p>8 A. I would say, yes.</p> <p>9 Q. More than ten?</p> <p>10 A. I can't say for sure.</p> <p>11 Q. So somewhere between five and ten?</p> <p>12 A. Yes.</p> <p>13 MR. MUNSHI: Just objection to</p> <p>14 form. She said she couldn't say.</p> <p>15 BY MS. FENDELL-SATINSKY:</p> <p>16 Q. Did you interview for any of the jobs</p> <p>17 you applied for in 2010?</p> <p>18 A. No.</p> <p>19 Q. Who is Andrew DiMeo?</p> <p>20 A. He was, when I was there, Andrew was</p> <p>21 the assistant director of finance, I believe</p> <p>22 is his title, in the College of Science and</p> <p>23 Technology dean's office.</p> <p>24 Q. Did you interact with him during your</p>
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<p>1 MR. MUNSHI: Objection to</p> <p>2 form.</p> <p>3 Go ahead, you can answer</p> <p>4 again.</p> <p>5 THE WITNESS: Uhm, before I</p> <p>6 left. It was -- I'm going to -- you</p> <p>7 know, around 2011, '12.</p> <p>8 BY MS. FENDELL-SATINSKY:</p> <p>9 Q. Why did you ask Shohreh Amini and</p> <p>10 Frank Friedman to serve as references for</p> <p>11 you in 2010?</p> <p>12 A. For internal job bids.</p> <p>13 Q. Were you seeking other jobs around</p> <p>14 2010?</p> <p>15 A. Internally. Yes, yes.</p> <p>16 Q. Why?</p> <p>17 A. Uhm, increased growth opportunity.</p> <p>18 Q. Did you apply for any jobs internally</p> <p>19 in 2010?</p> <p>20 A. Yes.</p> <p>21 Q. How many?</p> <p>22 A. Num -- I don't, I don't know.</p> <p>23 Q. Can you estimate?</p> <p>24 MR. MUNSHI: To the best that</p>	<p>1 employment at Temple?</p> <p>2 A. Yes, I did.</p> <p>3 Q. And what did you think of him?</p> <p>4 MR. MUNSHI: Just objection to</p> <p>5 form.</p> <p>6 You can answer if you</p> <p>7 understand.</p> <p>8 THE WITNESS: Uhm, I thought</p> <p>9 he was a nice young man initially.</p> <p>10 BY MS. FENDELL-SATINSKY:</p> <p>11 Q. Anything else?</p> <p>12 A. Say the question again.</p> <p>13 Q. Sure.</p> <p>14 I asked you what did you think of</p> <p>15 Mr. DiMeo, and you testified that you</p> <p>16 thought he was a nice young man initially.</p> <p>17 A. Right.</p> <p>18 Q. Did you have any other thoughts</p> <p>19 about --</p> <p>20 A. I did.</p> <p>21 Q. -- Mr. DiMeo?</p> <p>22 A. I did.</p> <p>23 Q. And what were those or what are</p> <p>24 those?</p>

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<p style="text-align: right;">Page 61</p> <p>1 A. When he was in on Dr. Wu's and my 2 morning meetings, our relationship got a 3 little confrontive. 4 Q. What do you mean? 5 A. He was -- he would be in on our 6 meeting with Dr. Wu, and he would just be 7 there and just sort of say the same thing he 8 did, Dr. Wu is right. 9 I don't know. I was told he was 10 there to be an advocate for me. 11 Q. I think my question was a little bit 12 different. 13 A. Okay. 14 MS. FENDELL-SATINSKY: Could 15 you read back my question, please. 16 THE COURT REPORTER: Uh-huh. 17 Well, technically it was, "What do 18 you mean?" Did you want the one 19 before that? 20 MS. FENDELL-SATINSKY: The 21 question before that. 22 THE COURT REPORTER: Question, 23 "And what were those and what are 24 those?"</p>	<p style="text-align: right;">Page 63</p> <p>1 that -- 2 Q. So -- I'm sorry. 3 MR. MUNSHI: She's still -- 4 BY MS. FENDELL-SATINSKY: 5 Q. Go ahead. 6 A. That he was just there for Greg. You 7 know, he was just Greg's message. It didn't 8 seem like his message. 9 Q. And that made you distrust him? 10 A. Yes. 11 Q. Any other reasons that you distrusted 12 him? 13 A. No. 14 Q. You said at some point that you -- 15 that your relationship became confrontive. 16 A. Yes. 17 Q. Which you've described confrontive as 18 distrusting, correct? 19 A. Yes. 20 Q. When did that happen? 21 A. Approximately 2012 to '13, around 22 that time period when he was told that he 23 would sit in on Dr. Wu's and my morning 24 meetings.</p>
<p style="text-align: right;">Page 62</p> <p>1 THE WITNESS: Those are -- 2 BY MS. FENDELL-SATINSKY: 3 Q. In asking your thoughts about him, 4 you testified that your relationship with 5 Mr. DiMeo at some point became confrontive; 6 is that correct? 7 A. Yes, it did. 8 Q. And so I asked you what did you mean 9 by confrontive. 10 A. Uhm, I distrusted him. 11 Q. Why? 12 A. Because I -- he wasn't advocating for 13 me. 14 Q. Any other reason you distrusted him? 15 A. He lied about me. 16 Q. Any other reason you distrusted him? 17 A. He, he allowed Dr. Wu to yell at me 18 in front of him, and I wanted him to stand 19 up for me. 20 Q. Any other reasons that you found 21 Mr. DiMeo -- that you distrusted Mr. DiMeo? 22 A. Honestly, yes. I, I thought because 23 he reported to Greg Wacker, who was the 24 director of finance in the dean's office,</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. You testified that you wanted 2 Mr. DiMeo to be your advocate, correct? 3 MR. MUNSHI: Objection to 4 form. 5 THE WITNESS: I was told he 6 would be my advocate. 7 BY MS. FENDELL-SATINSKY: 8 Q. Who told you that? 9 A. Mr. Wacker. 10 Q. What did Mr. Wacker tell you? 11 A. He told me that Andrew was there -- 12 or Drew was there. His name is "Drew." He 13 was there as like a mediator or a, you know, 14 neutral person. 15 Q. So not as a advocate, but as a 16 mediator or a neutral person? 17 A. I see. And advocacy. I mean, 18 someone who would be between Dr. Wu and 19 myself to -- sometimes he would just repeat 20 back what Dr. Wu means. 21 Q. So I want to know what Mr. Wacker 22 told you, so -- 23 A. Oh, that's what he told me. That's 24 why Drew was there. I asked him why Drew</p>

16 (Pages 61 to 64)

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<p>1 was there. 2 Q. And what did he say? 3 A. He said as an -- you know, to -- 4 "It's to help you, Ruth." 5 Q. Did he use the word "advocate"? 6 A. I, I, I can't say for sure. No, I 7 can't say for sure. 8 Q. Did anyone else tell you that 9 Mr. DiMeo was supposed to be an advocate for 10 you? 11 A. No. I -- I'm sorry. 12 Q. Go ahead. 13 A. Uh, yeah, Deirdre Walton did. 14 Q. And what did Ms. Walton tell you? 15 A. The same thing. I asked her why he 16 was in on the meetings, and she reported 17 that he was there to help me and to 18 communicate back to the dean's office. 19 Q. And based on what she said, you 20 interpreted that to mean that he was your 21 advocate? 22 A. Yes, I -- yes. 23 Q. Ms. Walton did not use the word 24 "advocate"; is that correct?</p>	<p>1 message? 2 A. Yes, it was. 3 Q. And that was your interpretation of 4 Mr. Wacker's message -- 5 A. Yes, it was. 6 Q. -- correct? 7 A. (Witness nods head.) 8 Q. Not what Mr. Wacker actually said, 9 right? 10 MR. MUNSHI: Just objection to 11 form. We've already gone over this. 12 BY MS. FENDELL-SATINSKY: 13 Q. Do you understand my question? 14 THE WITNESS: I don't know 15 what you mean. 16 MS. FENDELL-SATINSKY: Sure. 17 BY MS. FENDELL-SATINSKY: 18 Q. So, Ms. Briggs, today your attorney 19 may object to some of my questions. 20 A. Okay. 21 Q. Unless he tells you not to answer the 22 question, you should still answer the 23 question. 24 A. Okay.</p>
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<p>1 A. I can't, I can't -- that's correct. 2 I... 3 MR. MUNSHI: Were you done 4 answering? You said "I." 5 MS. FENDELL-SATINSKY: At any 6 point today if you're not -- 7 MR. MUNSHI: Wait, hold on. 8 Did you finish your -- 9 MS. FENDELL-SATINSKY: -- done 10 answering, please let me know. 11 MR. MUNSHI: Oh, I'm sorry. 12 THE WITNESS: Yeah. 13 MS. FENDELL-SATINSKY: Okay? 14 THE WITNESS: Yeah. 15 BY MS. FENDELL-SATINSKY: 16 Q. Did I cut off your answer? 17 A. No. I'm just -- I think I probably 18 assumed advocate, but it was implied that 19 they would -- he was there to help me. 20 Q. But she did not use the word 21 "advocate"? 22 A. No, she didn't. I can't say that she 23 did, no. 24 Q. That was your interpretation of her</p>	<p>1 Q. If you don't understand my questions 2 at any time, just let me know and I'll 3 rephrase them for you. 4 A. I don't understand -- 5 Q. Okay? 6 A. -- what he said. 7 MR. MUNSHI: I said objection 8 to form. Go ahead and answer it. 9 THE WITNESS: Oh, okay, all 10 right. I didn't hear him. 11 MS. FENDELL-SATINSKY: Sure. 12 THE WITNESS: Okay. 13 BY MS. FENDELL-SATINSKY: 14 Q. So you told me that based on your 15 conversation with Mr. Wacker you understood 16 and interpreted that Mr. DiMeo was to be 17 your advocate -- 18 A. Yes. 19 Q. -- correct? 20 A. Yes, that is correct. 21 Q. And Mr. Wacker did not tell you that 22 Mr. DiMeo was to be your advocate, right? 23 A. No. 24 Q. No, he did not say that?</p>

17 (Pages 65 to 68)

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<p>1 A. No, he did not say that. 2 Q. How old is Mr. DiMeo? 3 A. I'm going to guess. I'm going to 4 say -- 5 Q. I don't want you to guess, but if you 6 have -- 7 A. I don't know. 8 Q. -- an estimate, that's fine. 9 A. 40 years old. 10 Q. So Mr. DiMeo is younger than you, 11 right? 12 A. Yes. 13 Q. Did you view him as being younger 14 than you? 15 A. No. 16 MR. MUNSHI: Just objection to 17 form. 18 BY MS. FENDELL-SATINSKY: 19 Q. Did you view Mr. DiMeo as having less 20 experience than you? 21 A. No. 22 Q. Did you value Mr. DiMeo's input into 23 your meetings with Dr. Wu? 24 A. Initially, yes.</p>	<p>1 A. It -- 2 Q. So what did -- so when did your 3 valuing of Mr. DiMeo change? 4 A. When he was assigned to attend those 5 morning meetings. Within, I'd say, a month 6 or so. 7 Q. And what happened in a month or so 8 that made you change your valuation of 9 Mr. DiMeo? 10 A. They lied about me. I was written 11 up, disciplined. 12 Q. Were you disciplined by Mr. DiMeo? 13 A. No. By proxy. 14 Q. Mr. DiMeo never signed any of your 15 discipline, correct? 16 A. I can't say for sure if he did. I 17 think it was Greg Wacker most of the time. 18 Q. Mr. DiMeo was not somebody you 19 reported to, correct? 20 A. I report -- no. No, I did not. 21 Q. Did you find Mr. DiMeo's input to you 22 helpful? 23 A. Initially, yes. 24 Q. And then when did that change?</p>
Page 70	Page 72
<p>1 Q. And did that change at some point? 2 A. Yes. 3 Q. When did that change? 4 A. When he agreed with Dr. Wu. 5 Q. When was that? 6 A. Just about every morning. I don't 7 know. Yeah, I don't know. Often, 8 frequently. 9 Q. So am I correct that when Mr. DiMeo 10 agreed with Dr. Wu you did not value that 11 input? 12 A. I did not value, value it. No, I did 13 not. 14 Q. But you did value his input when he 15 didn't agree with Dr. Wu? 16 A. It was -- yeah, I did value him, but 17 it wasn't about that meeting. When I first 18 met him, I liked him; he was a great guy, 19 you know. 20 Q. So you said that your valuing of 21 Dr. -- of Mr. DiMeo changed when he agreed 22 with Dr. Wu, correct? 23 A. It -- can I -- that's wrong. 24 Q. Okay.</p>	<p>1 A. I would say about nine months before 2 I was terminated. 3 Q. And why was his input no longer 4 helpful nine months prior to the time your 5 employment at Temple ended? 6 A. Because he -- I was not permitted to 7 give a statement for what they were accusing 8 me of. 9 Q. And what were they accusing you of? 10 A. Not -- spelling somebody's name 11 wrong. Or, uhm, the big one that I got, the 12 big discipline was when I overslept. They 13 wouldn't let me get the person I talked to 14 when I called in late. They said I didn't 15 go through protocol. We had no protocol, 16 so... 17 Q. So nine months before the end of your 18 employment at Temple, you no longer found 19 Mr. DiMeo helpful to you? 20 A. No, I didn't, no. 21 Q. No, you did not find him helpful? 22 A. No, I did not find him helpful. 23 Q. Any other reason you did not find 24 Mr. DiMeo helpful other than he did not</p>

18 (Pages 69 to 72)

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<p style="text-align: right;">Page 73</p> <p>1 permit you to give a statement?</p> <p>2 A. Distrust, did I say that? Distrust.</p> <p>3 Q. And were those the reasons we spoke</p> <p>4 about earlier?</p> <p>5 A. Yes.</p> <p>6 Q. Anything else?</p> <p>7 A. No.</p> <p>8 Q. You said you did have a good</p> <p>9 relationship with Dr. -- with Mr. DiMeo at</p> <p>10 one point, correct?</p> <p>11 A. Yes.</p> <p>12 Q. And at one point you sent him a</p> <p>13 GoFundMe request to contribute to a fund for</p> <p>14 your son?</p> <p>15 A. Yes. And he did, yeah.</p> <p>16 Q. And he did contribute?</p> <p>17 A. His foundation did, yes.</p> <p>18 Q. And did you appreciate that?</p> <p>19 A. I did.</p> <p>20 Q. Did you send the GoFundMe request to</p> <p>21 everyone you worked with?</p> <p>22 A. Actually, I -- it came from my</p> <p>23 daughter, yes. But I think it went to a lot</p> <p>24 of them, yes.</p>	<p style="text-align: right;">Page 75</p> <p>1 THE WITNESS: Uhm, I was</p> <p>2 afraid of him.</p> <p>3 BY MS. FENDELL-SATINSKY:</p> <p>4 Q. Throughout your employment at Temple?</p> <p>5 A. Yes.</p> <p>6 Q. Why?</p> <p>7 A. He asked me to do things that were, I</p> <p>8 felt, morally objectionable, if not illegal.</p> <p>9 Q. What did he ask you to do that you</p> <p>10 found morally objectionable, if not illegal?</p> <p>11 A. The first thing he asked me to do was</p> <p>12 to find something on an employee in our</p> <p>13 office to get rid of her, that he didn't</p> <p>14 believe she had -- she had gotten family</p> <p>15 medical leave, intermittent leave, uhm, that</p> <p>16 she was faking it.</p> <p>17 Q. And who was that employee?</p> <p>18 A. Her name is Tanya. And I'm going to</p> <p>19 have to guess the spelling on her last name,</p> <p>20 Andrzejewski. Her married name is Hunnewell,</p> <p>21 but at the time it -- A-N-D -- I, I don't</p> <p>22 know.</p> <p>23 Q. What else did Mr. Wacker ask you to</p> <p>24 do that you viewed as morally objectionable,</p>
<p style="text-align: right;">Page 74</p> <p>1 Q. Did you give your daughter names of</p> <p>2 people?</p> <p>3 A. Yes, I did.</p> <p>4 Q. And the names you gave her, were</p> <p>5 how many names did you give her of people</p> <p>6 you worked with at Temple?</p> <p>7 A. I'm going to guess again.</p> <p>8 Q. I want you to estimate --</p> <p>9 A. Okay, estimate.</p> <p>10 Q. -- if you can, not guess.</p> <p>11 A. Estimate, I would say 30 to 50-ish on</p> <p>12 the...</p> <p>13 Q. Who is Greg Wacker?</p> <p>14 A. He's the director of finance in the</p> <p>15 dean's office of the College of Science and</p> <p>16 Technology.</p> <p>17 Q. And did you interact with Mr. Wacker</p> <p>18 during your employment at Temple?</p> <p>19 A. Yes.</p> <p>20 Q. What did you think of him?</p> <p>21 MR. MUNSHI: Just objection to</p> <p>22 form.</p> <p>23 You can answer if you</p> <p>24 understand.</p>	<p style="text-align: right;">Page 76</p> <p>1 if not illegal?</p> <p>2 A. He coached me before we met with an</p> <p>3 attorney about her lawsuit against Temple.</p> <p>4 Q. When was that?</p> <p>5 A. That would have been 2004.</p> <p>6 Q. And that was related to Tanya</p> <p>7 Hunnewell?</p> <p>8 A. Yes, it was.</p> <p>9 Q. What else did Mr. Wacker ask you to</p> <p>10 do that you found morally objectionable, if</p> <p>11 not illegal?</p> <p>12 A. To call her doctor's office.</p> <p>13 Q. To call Tanya Hunnewell's doctor's</p> <p>14 office?</p> <p>15 A. Yes.</p> <p>16 Q. Was that also around 2005?</p> <p>17 A. 2004 or '05, yeah.</p> <p>18 Q. Why don't you give me a list of</p> <p>19 everything that you found that Mr. Wacker</p> <p>20 asked you to do that you found morally</p> <p>21 objectionable, if not illegal.</p> <p>22 MR. MUNSHI: Beyond what she's</p> <p>23 already said, or recap?</p> <p>24</p>

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<p>1 BY MS. FENDELL-SATINSKY: 2 Q. Beyond what you've already told me. 3 A. To just that -- to do what people 4 tell me to do, that my superiors tell me to 5 do even if I struggle with, struggle with it 6 morally, ethically. 7 Q. Anything else? 8 A. No. 9 Q. So there are four things you told me 10 that Dr. -- that Mr. Wacker asked you to do 11 that you found morally objectionable, if not 12 illegal, correct? 13 A. Correct. 14 Q. Is there anything in addition to 15 those four things that you've already 16 testified about that Mr. Wacker asked you to 17 do that you found morally objectionable, if 18 not illegal? 19 A. Other than what -- yes. 20 Q. What else? 21 A. Judy Lennon, who was our department 22 secretary, he told me that they were trying 23 to find something on her to get rid of her 24 and that if he caught me helping her again</p>	<p>1 MS. FENDELL-SATINSKY: Thank 2 you. 3 --- 4 (Whereupon, the court reporter 5 read the last question.) 6 --- 7 THE WITNESS: No, I did not. 8 BY MS. FENDELL-SATINSKY: 9 Q. So if you help somebody with their 10 computer skills, then it's part -- their 11 performance of their computer skills is part 12 you, correct? 13 A. Yes. 14 Q. So it's not -- so when you helped 15 Ms. Lennon with her computer skills, that 16 was not adequately displaying her 17 performance, correct? 18 A. Yes. 19 Q. And if somebody is not adequately 20 displaying their own personal performance, 21 then they can't be properly assessed, right? 22 A. Yes. 23 Q. Any other things that Mr. Wacker 24 asked you to do that you found morally</p>
Page 78	Page 80
<p>1 that he would discipline me. 2 Q. Did Ms. Lennon struggle with some of 3 her job responsibilities? 4 A. With her computer skills. 5 Q. And did you help her with her 6 computer skills? 7 A. I did. 8 Q. Uhm, and did you understand that when 9 you helped her with her computer skills 10 Mr. Wacker couldn't assess what Ms. Lennon's 11 skills were? 12 A. He didn't -- he wasn't the one who 13 assessed her. 14 Q. Who did assess her? 15 A. Dr. Wu. 16 Q. When you helped Ms. Lennon with her 17 computer skills, did you understand that 18 Dr. Wu could not assess Ms. Lennon's 19 computer skills? 20 A. Please read the question again. 21 Q. Sure. 22 MS. FENDELL-SATINSKY: Could 23 you read it back, please. 24 THE COURT REPORTER: Uh-huh.</p>	<p>1 objectionable, if not illegal? 2 A. Expense report, uhm, file. You know, 3 to submit -- submitting expense reports. 4 Q. What about submitting expense 5 reports? 6 A. If it was justified in doing it or if 7 it was maybe illegal to, to do that. 8 Q. Well, what did he ask you to do with 9 an expense report that you found 10 objectionable or illegal? 11 A. To, to allocate expenses for, say, 12 travel or conference attendance, something 13 like that, uhm, to an NSF or an NIH grant 14 number, whether or not it was something that 15 was allowed. 16 Q. Did you know what every NSF or NIH 17 grant number permitted in terms of expenses? 18 A. Yes. 19 Q. You knew what every NSF grant -- 20 A. I knew -- well, I knew what you 21 weren't supposed to submit. 22 Q. So what did Mr. Wacker ask you to 23 submit that you felt you were not supposed 24 to submit?</p>

20 (Pages 77 to 80)

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<p>1 A. Specifically, he just said, "Ruth, 2 don't question it. You've been asked to do 3 it. Just file it. Hit it. Send it. It's 4 not your problem," and I did. 5 Q. Did Mr. Wacker ask you to submit any 6 expense report that you believed was 7 expensed to -- improperly to an account or a 8 grant? 9 A. I, I asked. I didn't know the 10 answer. I asked if it was not. So I don't 11 know whether or not it was, but I went to 12 him. 13 Q. Okay. So my question is a little 14 different. 15 A. Uh-huh. 16 Q. Is there anything that Mr. Wacker 17 asked you to submit in an expense report 18 that you believed -- 19 A. Okay, okay. 20 Q. -- was not properly allocated to a 21 grant or an expense account? 22 A. No. 23 Q. When did he ask you to submit an 24 expense report that you found morally</p>	<p>1 always or the dean always did it, too. 2 Q. Did you have the ability to terminate 3 the administrative staff? 4 A. Tanya Hunnewell, I did. 5 Q. You terminated her? 6 A. She reported directly to me. 7 Q. And you made the decision to 8 terminate Tanya? 9 A. No, I did not. 10 Q. Right. So I'm asking if you 11 personally had the ability to terminate the 12 administrative staff who you say reported to 13 you. 14 MR. MUNSHI: Objection to 15 form. Asked and answered. 16 THE WITNESS: Just Tanya. 17 BY MS. FENDELL-SATINSKY: 18 Q. But you did not. It was not your 19 decision to terminate Tanya? 20 A. No, it was not mine. 21 Q. Did you have the ability to 22 discipline -- 23 A. Yes. 24 Q. -- the administrative staff --</p>
Page 82	Page 84
<p>1 objectionable, if not illegal? 2 A. It was my last year there, 2013. 3 Q. How many times? 4 A. One comes to mind. 5 Q. Any other times? 6 A. No. 7 Q. Any other things that Mr. Wacker 8 asked you to do that you found morally 9 objectionable, if not illegal? 10 A. That I shouldn't -- he asked me to 11 not give Keya Sadeghipour, who was the 12 acting dean, the information he wanted that 13 he had asked me for. 14 Q. What information did Keya Sadeghipour 15 ask you for? 16 A. He asked me to do -- he asked me to 17 look at all employees that I -- that 18 reported to me and report their absences. 19 Q. Who reported to you? 20 A. The administrative staff. 21 Q. You were their supervisor? 22 A. Yes. 23 Q. Did you do their reviews? 24 A. I contributed to them. The chair</p>	<p>1 A. Yes, I did. 2 Q. -- who reported to you? 3 A. Yes. 4 Q. Without seeking authorization from 5 somebody else? 6 A. No. 7 Q. Okay. And who did you have to seek 8 approval from before you could discipline 9 the administrative staff? 10 A. I didn't need approval. I just -- it 11 went to another level. I could, I could do 12 a disciplinary action if I needed to, but 13 I -- it would go to the next level. 14 Q. What do you mean it would go to the 15 next level? 16 A. Well, then it would -- Greg would 17 review it. 18 Q. So Mr. Wacker would approve any 19 discipline you wanted to give before you 20 gave the discipline? 21 A. If I did. I never did. 22 Q. So you never issued discipline to -- 23 A. I never, no. 24 Q. Let me finish my questions.</p>

21 (Pages 81 to 84)

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<p style="text-align: right;">Page 85</p> <p>1 A. Okay, sorry.</p> <p>2 Q. You never issued discipline to any of</p> <p>3 the administrative staff who you say</p> <p>4 reported to you?</p> <p>5 A. No, I did not.</p> <p>6 Q. Going back to the information that</p> <p>7 Mr. Wacker asked you not to give to Keya,</p> <p>8 did he tell you why he did not want you to</p> <p>9 give that information to him?</p> <p>10 A. Because of the -- he -- when Keya</p> <p>11 came in as acting dean, he changed some of</p> <p>12 the policies about, about reporting and --</p> <p>13 Q. My question is a little bit</p> <p>14 different.</p> <p>15 A. Okay.</p> <p>16 MS. FENDELL-SATINSKY: Can you</p> <p>17 read back my question, please.</p> <p>18 THE COURT REPORTER: Uh-huh.</p> <p>19 ---</p> <p>20 (Whereupon, the court reporter</p> <p>21 read back the last question.)</p> <p>22 ---</p> <p>23 MR. MUNSHI: She just answered</p> <p>24 that.</p>	<p style="text-align: right;">Page 87</p> <p>1 A. He wasn't my supervisor.</p> <p>2 Q. In doing so, you did not listen to a</p> <p>3 direction of someone superior to you,</p> <p>4 correct?</p> <p>5 A. I did listen. I listened to my, my</p> <p>6 supervisor, Keya.</p> <p>7 Q. Keya was your supervisor?</p> <p>8 A. Yes, he was. Keya Sadeghipour was my</p> <p>9 supervisor.</p> <p>10 Q. He was the person that you reported</p> <p>11 to?</p> <p>12 A. Reported to, uh-huh.</p> <p>13 Q. From when to when?</p> <p>14 A. He was at the college for 2002 to</p> <p>15 2000 -- the end of 2003. I'm guessing about</p> <p>16 the time.</p> <p>17 Q. So this incident with Keya happened</p> <p>18 in 2002 or 2003?</p> <p>19 A. Right. During his term as interim</p> <p>20 dean.</p> <p>21 Q. Anything else that Mr. Wacker asked</p> <p>22 you to do that you found morally</p> <p>23 objectionable, if not illegal, other than</p> <p>24 what you've already told me?</p>
<p style="text-align: right;">Page 86</p> <p>1 You can answer again if you</p> <p>2 want.</p> <p>3 BY MS. FENDELL-SATINSKY:</p> <p>4 Q. Can you answer that question?</p> <p>5 A. Yeah. Uhm, I think I understand the</p> <p>6 question.</p> <p>7 Keya was there half-time. He was</p> <p>8 between two colleges, and when he leaves he</p> <p>9 just had to know what we're doing here.</p> <p>10 Q. Anything else he told you?</p> <p>11 A. No.</p> <p>12 Q. Did you ultimately give that</p> <p>13 information to Keya?</p> <p>14 A. I did.</p> <p>15 Q. And how -- did you tell Mr. Wacker</p> <p>16 that you were going to give the information</p> <p>17 to Keya?</p> <p>18 A. I did not, no.</p> <p>19 Q. So you disregarded Mr. Wacker's</p> <p>20 request not to give Keya the information,</p> <p>21 correct?</p> <p>22 A. That's correct.</p> <p>23 Q. And in doing so, you didn't listen to</p> <p>24 a direction of your supervisor, right?</p>	<p style="text-align: right;">Page 88</p> <p>1 A. No.</p> <p>2 MR. MUNSHI: We've been going</p> <p>3 about an hour. Can we take five?</p> <p>4 MS. FENDELL SATINSKY: I just</p> <p>5 want to finish this line of</p> <p>6 questioning.</p> <p>7 MR. MUNSHI: Okay. Yeah,</p> <p>8 whenever you're done with this line</p> <p>9 of questions.</p> <p>10 BY MS. FENDELL-SATINSKY:</p> <p>11 Q. The incident involving Keya where you</p> <p>12 say Keya asked you for information and</p> <p>13 Mr. Wacker told you not to give it to him,</p> <p>14 when did that occur?</p> <p>15 A. Right after his appointment as acting</p> <p>16 dean. So, the date is not clear to me. I'm</p> <p>17 thinking it's probably July, the summer of</p> <p>18 2003-'04.</p> <p>19 Q. That did not happen in 2013?</p> <p>20 A. With Keya?</p> <p>21 Q. Yes.</p> <p>22 A. No, uh-huh.</p> <p>23 Q. What did Mr. Wacker ask you to do in</p> <p>24 regards to calling Tanya Hunnewell's</p>

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<p>1 doctor's office in 2005?</p> <p>2 A. If she -- she was out, had called</p> <p>3 out, and he wanted her doctor to say that</p> <p>4 she was sick.</p> <p>5 Q. Did you call her doctor's office?</p> <p>6 A. No, I did not.</p> <p>7 Q. Did he ask you to call her doctor's</p> <p>8 office?</p> <p>9 A. He did.</p> <p>10 Q. And in 2005 Mr. Wacker was senior to</p> <p>11 you, correct?</p> <p>12 A. Yes.</p> <p>13 MR. MUNSHI: Just objection to</p> <p>14 form.</p> <p>15 THE WITNESS: Yeah, yes.</p> <p>16 BY MS. FENDELL-SATINSKY:</p> <p>17 Q. Do you understand what -- when I say</p> <p>18 the word "senior," what do you mean? What</p> <p>19 did you understand that to mean?</p> <p>20 A. It means that his grade level is</p> <p>21 higher than me and he was also the, you</p> <p>22 know, the director of finance in the college</p> <p>23 dean's office.</p> <p>24 Q. So Mr. Wacker asked you to call</p>	<p>1 Do you know what it was or --</p> <p>2 A. It was, I mean, because it was</p> <p>3 financial in nature.</p> <p>4 Q. So it dealt with reporting grant</p> <p>5 numbers?</p> <p>6 A. Reporting expenses. Allocating</p> <p>7 expenses, I should say.</p> <p>8 Q. And was that what we spoke about?</p> <p>9 Did that relate to the --</p> <p>10 A. Yes.</p> <p>11 Q. -- what we spoke about earlier when</p> <p>12 you told me that Dr. Wacker asked you to</p> <p>13 submit expense reports to NSF or NHI (sic)</p> <p>14 grant numbers that you found morally</p> <p>15 objectionable?</p> <p>16 A. Yes. And it's "Mr. Wacker."</p> <p>17 Q. I'm sorry. I'm giving him an extra</p> <p>18 title.</p> <p>19 MR. MUNSHI: Is now a good</p> <p>20 time?</p> <p>21 MS. FENDELL-SATINSKY: Let's</p> <p>22 take a break.</p> <p>23 THE VIDEOGRAPHER: This</p> <p>24 concludes video No. 1.</p>
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<p>1 Ms. Hunnewell's doctor, and you did not do</p> <p>2 that, correct?</p> <p>3 A. No, I did not.</p> <p>4 Q. And by not doing that, you didn't</p> <p>5 listen to a direction he gave you, correct?</p> <p>6 A. That is true, yes.</p> <p>7 Q. You said Mr. Wacker told you to do</p> <p>8 what your superiors tell you to do even if</p> <p>9 you struggle morally or ethically with it?</p> <p>10 A. That -- not then. Later.</p> <p>11 Q. When did he tell you that?</p> <p>12 A. With Dr. Wu. That would have been</p> <p>13 2000 -- like 2009 to my termination.</p> <p>14 Q. Did he tell you that in regard to a</p> <p>15 specific incident or did he make the</p> <p>16 statement generally?</p> <p>17 A. It was a specific incident, but I</p> <p>18 can't -- it would have been something I</p> <p>19 questioned about.</p> <p>20 Q. What was the specific incident?</p> <p>21 A. It would have been about reporting,</p> <p>22 you know, the grant numbers and what I could</p> <p>23 do with them.</p> <p>24 Q. You said it would have been.</p>	<p>1 We're going off the record.</p> <p>2 The time is 11:23.</p> <p>3 ---</p> <p>4 (Whereupon, a brief recess was</p> <p>5 taken from 11:23 until 11:35 a.m.)</p> <p>6 ---</p> <p>7 THE VIDEOGRAPHER: Going back</p> <p>8 on the record at 11:35. Here</p> <p>9 begin's video No. 2.</p> <p>10 Please proceed.</p> <p>11 BY MS. FENDELL-SATINSKY:</p> <p>12 Q. Ms. Briggs, before the break you told</p> <p>13 me that you believe you had administrative</p> <p>14 staff who reported to you?</p> <p>15 A. Uh-huh.</p> <p>16 Q. Is that a "yes"?</p> <p>17 A. Yes, it is. I'm sorry.</p> <p>18 Q. What time period was that?</p> <p>19 A. 2002 to maybe 6 months. A very short</p> <p>20 period of time.</p> <p>21 Q. So for about a six-month period you</p> <p>22 had administrative staff reporting to you?</p> <p>23 A. Tanya did. I was her direct</p> <p>24 supervisor.</p>

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<p>1 Q. Did you have anyone else who reported 2 to you during the time you worked at Temple? 3 A. Not direct report, no. 4 Q. Do you know how old Mr. Wacker is? 5 A. No, I do not. 6 Q. Do you have an estimate of how old he 7 is? 8 A. 55, maybe. 9 Q. At some point, you asked Mr. Wacker 10 to serve as a reference for you, correct? 11 A. I did not. 12 Q. You don't believe you ever asked 13 Mr. Wacker to serve as a reference for you? 14 A. I don't recall doing that. 15 Q. You started working at Temple in 16 February 2001 -- 17 A. That is -- 18 Q. -- is that right? 19 A. Yes. 20 Q. And you stopped working at Temple on 21 April 1st, 2014? 22 A. Yes. 23 Q. At the time your employment at Temple 24 ended, how much did you earn?</p>	<p>1 bonus at any time during your employment at 2 Temple? 3 A. Yes. 4 Q. When were you entitled to a bonus? 5 A. From 2003 until my first disciplinary 6 action, 2012. 7 Q. What was your understanding of why 8 you were not eligible for a bonus after 9 2012? 10 A. I was on probation. 11 Q. And is it your understanding that 12 when an employee is on probation they're not 13 eligible for a bonus? 14 A. That's my understanding. 15 Q. Did anyone tell you that? 16 A. Yes. 17 Q. Who? 18 A. Greg. 19 Q. Wacker? 20 A. Uh-huh. 21 Q. Is that a "yes"? 22 A. Yes. I'm sorry. 23 Q. Did he tell you in a written 24 communication?</p>
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<p>1 A. Fifty-one and, maybe, five-hundred, 2 something like that. 3 Q. Were you eligible for any type of 4 bonus at the time your employment with 5 Temple ended? 6 A. No. 7 Q. At any time during your employment at 8 Temple, were you eligible for a bonus? 9 A. Yes. 10 Q. When were you eligible for a bonus? 11 A. From the time I started, I believe. 12 Let me retract that. The first year I was a 13 contract employee was TAUP. 14 Q. T -- 15 A. Or no. A union; I was union, was my 16 first job there. 17 Q. So when you started at Temple in 18 2001, you were a union employee? 19 A. Yes. 20 Q. And as a union employee, were you 21 entitled to a bonus? 22 A. I don't know the answer to that 23 question. 24 Q. Were you eligible for any kind of</p>	<p>1 A. No. 2 Q. In an oral conversation? 3 A. Yes. 4 Q. Did anyone else tell you that you're 5 not eligible for a bonus when you're on 6 probation? 7 A. No. Not that I remember, no. 8 Q. Were you on probation in 2012? 9 A. Yes. 10 Q. Were you on probation in 2013? 11 A. Yes. 12 Q. Were you on probation in 2014? 13 A. Yes. 14 Q. And what did you understand being on 15 probation to mean? 16 A. There was a time period after a 17 disciplinary action was given, which was a 18 year, and we couldn't bid on jobs and get 19 bonuses. 20 Q. Did you understand that also meant 21 that if you had another similar infraction 22 that could lead to the next step in the 23 discipline process? 24 A. Yes.</p>

24 (Pages 93 to 96)

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<p>1 Q. And in some instances the next step 2 of the discipline process could be 3 termination? 4 A. Could you repeat that? 5 Q. Sure. The next step in the 6 discipline process in some instances could 7 be termination? 8 A. Yes, I did know that. 9 Q. What was your first job at Temple? 10 A. I was the editorial assistant to 11 Kamel Khalili in the Center for 12 Neurovirology and Cancer Biology. 13 Q. What was your pay in that job? 14 A. I believe it was 34,000. 15 Q. Who was your supervisor? 16 A. Kamel Khalili, K-A-M, as in Mary, 17 E-L. Last name is K-H-A-L-I-L-I. 18 Q. Does Mr. Khalili -- 19 A. Doctor. 20 Q. Dr. Khalili, does Dr. Khalili still 21 work at Temple? 22 A. Yes, he does. 23 Q. What did you think of Dr. Khalili as 24 a supervisor?</p>	<p>1 meant AFSCME. 2 Q. So you were not a part of the TAUP 3 union? 4 A. No. 5 Q. You were part of the AFSCME -- 6 A. AFSCME. 7 Q. -- union. 8 A. Uh-huh. 9 Q. And that was in your first job as the 10 editorial assistant? 11 A. Yes, uh-huh. 12 Q. Uhm, did -- you told me that you felt 13 Dr. Khalili was not always fair because he 14 was telling the shop steward not to do 15 things? 16 A. No, no, no. That's not what I said. 17 Q. Okay. 18 A. Can I repeat that? 19 Q. So why did you not believe 20 Dr. Khalili was not always fair? 21 A. He, he was inconsistent, I think, 22 about -- I had no written job description 23 that was other than a generic description 24 for Temple.</p>
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<p>1 A. He was tough, but I liked him. 2 Q. Did you think he was fair? 3 A. Not always, no. 4 Q. In what ways? 5 A. The shop steward from the -- did I 6 say "TAUP"? I meant, I meant, uhm, AFSCME. 7 I'm sorry. TAUP is the faculty union. Uhm, 8 the AFSCME shop steward was in my building, 9 and he was always around and telling me, 10 "You don't have to do that. You don't have 11 to do that," so... 12 It was my first hourly job since high 13 school, so... 14 Q. You told me your pay was \$34,000. 15 A. Approx -- I'm guess -- I'm not -- I 16 don't know the exact amount. 17 Q. Were you paid by the hour or were you 18 paid a salary? 19 A. I was paid -- I was hourly. 20 Q. And what was your hourly rate? 21 A. I don't know. I can't remember. 22 Q. You said initially that you were a 23 part of TAUP union and -- 24 A. But I re -- okay. Correcting that, I</p>	<p>1 Q. In what way did you find him 2 inconsistent? 3 A. About assignments there, when they 4 changed or... 5 Q. Were you the only editorial 6 assistant? 7 A. Yes, I was. 8 Q. So no one else had your job, correct? 9 A. No one else had my job. 10 Q. Were there any other ways in which 11 you found Dr. Khalili to be not always fair? 12 A. He was a tough supervisor. I'm 13 trying to think of instances. 14 One comes to mind. I went to the 15 bathroom one time, and he came into my 16 office and I wasn't there and reported me as 17 away from my desk without permission. So, 18 Cindy was the office supervisor. She came 19 to me. 20 Q. Did you ask Dr. Khalili if you could 21 go to the restroom on that occasion? 22 A. No, I did not. 23 Q. Did you ask Cindy if you could go to 24 the restroom on that occasion?</p>

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<p>1 A. No, I did not.</p> <p>2 Q. Were you disciplined for that?</p> <p>3 A. I, I was -- I don't know if it was a</p> <p>4 formal discipline, but I definitely was</p> <p>5 called into his office, yeah.</p> <p>6 Q. Were you placed on a probation as a</p> <p>7 result of that incident?</p> <p>8 A. I'm not sure, really. I know that</p> <p>9 there was some -- he called me in and showed</p> <p>10 me something. I don't know if there was a</p> <p>11 discipline. I don't have a copy of it.</p> <p>12 Q. Why did you feel that was not</p> <p>13 always -- that that was not fair?</p> <p>14 A. Because it wasn't -- the job</p> <p>15 description -- I mean the duties changed, so</p> <p>16 I wasn't aware of them until -- it just sort</p> <p>17 of fell on me.</p> <p>18 Q. Any other ways in which you felt</p> <p>19 Dr. Khalili was not fair to you?</p> <p>20 A. Intrusive about personal things.</p> <p>21 Like, you know, the bathroom; uhm, if one of</p> <p>22 my children call -- and I was not on the</p> <p>23 phone, but if my kids called, he'd want to</p> <p>24 know the content of the conversation.</p>	<p>1 Q. Did he ask you what you did in the</p> <p>2 bathroom?</p> <p>3 A. No.</p> <p>4 Q. So he just was upset that you had</p> <p>5 gone to the bathroom --</p> <p>6 A. Right.</p> <p>7 Q. -- without his permission?</p> <p>8 A. Yes.</p> <p>9 Q. And you believe that was unfair</p> <p>10 because you were embarrassed by that?</p> <p>11 A. No. Because it wasn't something I</p> <p>12 had to do before. It just sort of happened</p> <p>13 that time. It wasn't a department rule</p> <p>14 where people had to...</p> <p>15 Q. After Dr. Khalili spoke with you, did</p> <p>16 you understand that you had to request</p> <p>17 permission before you left your desk?</p> <p>18 A. I did. Yes, I did.</p> <p>19 Q. And after he spoke with you, did you</p> <p>20 request permission to leave your desk when</p> <p>21 you did leave your desk?</p> <p>22 A. He told me to report to Cindy. And,</p> <p>23 yes, I did.</p> <p>24 MR. MUNSHI: What are we</p>
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<p>1 Q. Any other ways in which you found</p> <p>2 Dr. Khalili to be not fair?</p> <p>3 A. No.</p> <p>4 Q. Do you know if Dr. Khalili asked</p> <p>5 anyone else about the contents of their</p> <p>6 conversations, their non-work conversations</p> <p>7 at the office?</p> <p>8 A. I'm not aware of that. I wouldn't</p> <p>9 be. I don't know that.</p> <p>10 Q. You said that you didn't think it was</p> <p>11 fair when you went to the restroom and</p> <p>12 Dr. Khalili reported you as away from your</p> <p>13 desk?</p> <p>14 A. Yes.</p> <p>15 Q. Why did you not believe that was</p> <p>16 fair?</p> <p>17 A. Well, I was embarrassed. Uhm, I</p> <p>18 thought, bathroom behavior, what I do in the</p> <p>19 bathroom is pretty much mine.</p> <p>20 Q. Did he ask you what you did in the</p> <p>21 bathroom, or he was just upset that --</p> <p>22 A. No. Ask me --</p> <p>23 Q. Let me ask my question.</p> <p>24 A. Okay. I'm sorry.</p>	<p>1 calling this?</p> <p>2 THE COURT REPORTER: Briggs?</p> <p>3 MS. FENDELL-SATINSKY:</p> <p>4 Perfect, Briggs, Briggs 1.</p> <p>5 MR. MUNSHI: Can we call them</p> <p>6 Defendant's 1? Otherwise, when I</p> <p>7 mark them, it will be all confusing.</p> <p>8 MS. FENDELL-SATINSKY: I think</p> <p>9 there's a lot of them that are</p> <p>10 already marked.</p> <p>11 THE COURT REPORTER: I can</p> <p>12 remark them. That's fine.</p> <p>13 MS. FENDELL-SATINSKY: If you</p> <p>14 want to just put, like, D, dash,</p> <p>15 Briggs or something like that?</p> <p>16 THE COURT REPORTER: Is that</p> <p>17 okay or do you want just --</p> <p>18 MR. MUNSHI: I'm just trying</p> <p>19 to think down the road if I'm</p> <p>20 marking things as Plaintiff-1 and</p> <p>21 then there's Briggs-1 and</p> <p>22 Plaintiff-1, it's going to get</p> <p>23 really confusing.</p> <p>24 THE COURT REPORTER: So you</p>

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<p style="text-align: right;">Page 105</p> <p>1 want D-1?</p> <p>2 MR. MUNSHI: I would just</p> <p>3 propose D-1.</p> <p>4 THE COURT REPORTER: D-1?</p> <p>5 MR. MUNSHI: Or Defendant's 1.</p> <p>6 THE COURT REPORTER: Okay.</p> <p>7 MR. MUNSHI: But it's up to</p> <p>8 you.</p> <p>9 THE COURT REPORTER: That's</p> <p>10 fine.</p> <p>11 MS. FENDELL-SATINSKY: I don't</p> <p>12 care.</p> <p>13 MR. MUNSHI: Thank you.</p> <p>14 ---</p> <p>15 (Whereupon, Temple Hire Sheet,</p> <p>16 Bates No. TEMPLE0076-77, was marked</p> <p>17 as D Exhibit No. 1 for</p> <p>18 identification.)</p> <p>19 ---</p> <p>20 BY MS. FENDELL-SATINSKY:</p> <p>21 Q. Ms. Briggs, the court reporter has</p> <p>22 given you a document that's been marked as</p> <p>23 D-1. Take a look at this document, and my</p> <p>24 first question for you is going to be</p>	<p style="text-align: right;">Page 107</p> <p>1 ---</p> <p>2 (Whereupon, the court reporter</p> <p>3 read back the last question.)</p> <p>4 ---</p> <p>5 THE WITNESS: Uh, no.</p> <p>6 BY MS. FENDELL-SATINSKY:</p> <p>7 Q. And going back to something you told</p> <p>8 me earlier, you mentioned an experience when</p> <p>9 Dr. Khalili asked you about going to the</p> <p>10 restroom and why you were not at your desk,</p> <p>11 correct?</p> <p>12 A. Where I had been, yes.</p> <p>13 Q. Do you know if he asked anyone else</p> <p>14 why they left their desk and went to the</p> <p>15 bathroom or where they had been?</p> <p>16 A. No, I don't.</p> <p>17 Q. After your job as editorial</p> <p>18 assistant, did you have another job at</p> <p>19 Temple?</p> <p>20 A. Yes.</p> <p>21 Q. What was your next job?</p> <p>22 A. Executive assistant to the dean in</p> <p>23 the College of Science and Technology.</p> <p>24 Q. When did you obtain that role?</p>
<p style="text-align: right;">Page 106</p> <p>1 whether you've ever seen this document.</p> <p>2 A. It's hard for me to read. Is the</p> <p>3 first heading -- or second heading "internal</p> <p>4 compliance"? I can't read the first word.</p> <p>5 "Internal compliance"?</p> <p>6 Q. So the first section I believe says</p> <p>7 "Temple University Human Resources Action</p> <p>8 Authorization," and then the next section</p> <p>9 says "Internal Compliance."</p> <p>10 A. Okay. Thank you.</p> <p>11 Q. The next section after that says</p> <p>12 "External Compliance."</p> <p>13 A. Thank you.</p> <p>14 I've never seen this before, I don't</p> <p>15 recall.</p> <p>16 Q. Is this consistent with -- is there</p> <p>17 anything about this that's inconsistent with</p> <p>18 your position as an editorial assistant at</p> <p>19 Temple?</p> <p>20 A. Could you repeat the question again.</p> <p>21 Q. Sure.</p> <p>22 MS. FENDELL-SATINSKY: Can you</p> <p>23 read it back, please.</p> <p>24 THE COURT REPORTER: Uh-huh.</p>	<p style="text-align: right;">Page 108</p> <p>1 A. It was 2002.</p> <p>2 Q. Did you apply for that job?</p> <p>3 A. Yes, I did.</p> <p>4 Q. And you were selected?</p> <p>5 A. Yes.</p> <p>6 Q. Did you want that job?</p> <p>7 A. Yes.</p> <p>8 Q. Why did you want that job?</p> <p>9 A. Because I was told by the development</p> <p>10 director that I would be helping him more</p> <p>11 than anyone. And my background is in</p> <p>12 development and fundraising; I was excited</p> <p>13 about that.</p> <p>14 Q. Who was the development director?</p> <p>15 A. His name was Gregory Murphy, and he</p> <p>16 was the director of development for the</p> <p>17 College of Science and Technology.</p> <p>18 Q. But when you applied for the role of</p> <p>19 executive assistant, you understood that you</p> <p>20 would be reporting to the dean; is that</p> <p>21 right?</p> <p>22 A. Yes. But he was part of the, the</p> <p>23 group that interviewed me.</p> <p>24 Q. But you understood when you applied</p>

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<p>1 for the job that you would not be reporting 2 to Mr. Murphy, correct? 3 A. Supervisor. I understood that, yes. 4 MR. MUNSHI: You can put that 5 to the side. 6 THE WITNESS: I don't know 7 what this is. 8 MR. MUNSHI: You can put it to 9 the side. It's okay. She'll tell 10 you if you -- 11 THE WITNESS: Okay. 12 BY MS. FENDELL-SATINSKY: 13 Q. Did your salary change when you 14 became an executive assistant? 15 A. Yes, it did. 16 Q. And what did -- how did your pay 17 change? 18 A. It went -- I'm thinking around 40, 19 maybe a little less. 20 Q. Did you have additional 21 responsibilities as executive assistant that 22 you had not had as an editorial assistant? 23 A. Oh, yes. 24 Q. And who was the dean of the College</p>	<p>1 Bates No. TEMPLE0078-80, was marked 2 as D Exhibit No. 2 for 3 identification.) 4 --- 5 BY MS. FENDELL-SATINSKY: 6 Q. The court reporter has given you a 7 document that was marked as D-2. 8 A. Uh-huh. 9 Q. Same first question; I'm going to ask 10 whether you've seen this document before. 11 A. No, I have not. I don't -- 12 MR. MUNSHI: Take your time. 13 THE WITNESS: No, I have not. 14 BY MS. FENDELL-SATINSKY: 15 Q. On the first page, it says the date 16 this was issued was February 14th, 2005. 17 Do you see that? 18 A. I see that. 19 Q. Does that refresh your recollection 20 about when you started as the executive 21 assistant to Dean Nicholson? 22 A. 2005, this says? Is that what -- 23 Q. That's what it says. 24 A. Yeah, okay. Yeah, okay.</p>
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<p>1 of Science and Technology at that time? 2 A. Allen Nicholson. 3 Q. Had you worked with Dean Nicholson in 4 your role as an editorial assistant? 5 A. No. 6 Q. What did you think of Dean Nicholson? 7 MR. MUNSHI: Objection to 8 form. 9 THE WITNESS: Very fine -- 10 MR. MUNSHI: Go ahead. 11 THE WITNESS: Very -- a fine 12 man, very -- a good man. I really 13 liked Dr. Nicholson. 14 BY MS. FENDELL-SATINSKY: 15 Q. Did you like him as a supervisor? 16 A. Yes. 17 Q. Did you think he was a fair 18 supervisor? 19 A. Yes. 20 THE COURT REPORTER: D-2. 21 MR. MUNSHI: Thank you. 22 --- 23 (Whereupon, 2/14/05 Temple HR 24 Affirmative Action Authorization,</p>	<p>1 Q. So I'm asking: Does that refresh 2 your recollection as to when you -- 3 A. Yes. 4 Q. -- started working in that role? 5 A. Yes. 6 Q. So do you believe you started working 7 for Dean Nicholson in 2005? 8 A. Yes. 9 Q. And it says recommended starting 10 salary \$45,500. 11 Do you see that? 12 A. I see that. 13 Q. Does that refresh your recollection 14 about what your salary was when you were -- 15 started as the executive assistant for 16 Dean Nicholson? 17 A. I don't remember it now, but I see 18 it, yeah. 19 Q. Do you have any reason to doubt 20 that's what your salary was when you 21 started -- 22 A. I have no reason -- 23 Q. -- reporting to Dean Nicholson? 24 A. No, I don't doubt it.</p>

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<p>1 Q. Did you like your job working for</p> <p>2 Dean Nicholson?</p> <p>3 A. I did.</p> <p>4 Q. What were your responsibilities as</p> <p>5 Dean Nicholson's executive assistant?</p> <p>6 A. To deal with the committees, the</p> <p>7 deans' committees, the college committees,</p> <p>8 some university committees; uhm, taking care</p> <p>9 of doing the faculty side of graduation and</p> <p>10 commence -- any, any kind of formal event</p> <p>11 where they would need academic regalia and a</p> <p>12 platform party.</p> <p>13 Q. Did you have responsibilities for</p> <p>14 Dean Nicholson's schedule?</p> <p>15 A. Yes, I did.</p> <p>16 Q. Did you have responsibilities to plan</p> <p>17 events?</p> <p>18 A. Yes.</p> <p>19 Q. Were you responsible for submitting</p> <p>20 Dean Nicholson's expense reports?</p> <p>21 A. Yes.</p> <p>22 Q. Were you responsible for booking</p> <p>23 travel for Dean Nicholson?</p> <p>24 A. No.</p>	<p>1 Mr. Sadeghipour from 2001 to 2005 --</p> <p>2 A. I had met him.</p> <p>3 Q. -- is that correct?</p> <p>4 A. I met him.</p> <p>5 Q. Other than meeting him, had you had</p> <p>6 any other interactions with Dr. Sadeghipour</p> <p>7 from 2001 to 2005?</p> <p>8 A. No.</p> <p>9 Q. When you became Dean Sadeghipour's</p> <p>10 executive assistant, did you have the same</p> <p>11 responsibilities you had as Dean Nicholson's</p> <p>12 executive assistant?</p> <p>13 A. Pretty much, yes. He tweaked them a</p> <p>14 little bit, but...</p> <p>15 Q. In what way?</p> <p>16 A. Because he was there half-time, he</p> <p>17 wanted me to report to him every day what</p> <p>18 was going on in the office.</p> <p>19 Q. And was that not something you did</p> <p>20 for Dean Nicholson?</p> <p>21 A. No.</p> <p>22 Q. Other than reporting to him what was</p> <p>23 going on every day, were there any other</p> <p>24 changes that Mr. Sadeghipour made to your</p>
Page 114	Page 116
<p>1 Q. Who booked Dean Nicholson's travel?</p> <p>2 A. I don't know. He wasn't there -- he</p> <p>3 was only there for the first two months or</p> <p>4 three months I was there.</p> <p>5 Q. Dean Nicholson was?</p> <p>6 A. Yes.</p> <p>7 Q. And then what happened to him?</p> <p>8 A. He was replaced with Keya Sadeghipour</p> <p>9 as the acting dean. I believe it was July</p> <p>10 1st is the -- yeah.</p> <p>11 Q. July 1st of 2005?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know why Dean Nicholson was</p> <p>14 replaced by Keya Sadeghipour?</p> <p>15 A. No, I do not.</p> <p>16 Q. And when Dean Nicholson was replaced</p> <p>17 by Mr. Sadeghipour -- Dr. Sadeghipour, did</p> <p>18 you keep your position as executive</p> <p>19 assistant?</p> <p>20 A. Yes.</p> <p>21 Q. Had you worked with Mr. Sadeghipour</p> <p>22 prior to 2005?</p> <p>23 A. No.</p> <p>24 Q. So you had no interactions with</p>	<p>1 responsibilities?</p> <p>2 A. He was -- he took away my -- I asked</p> <p>3 him to take away my, uhm, supervisory role</p> <p>4 over Tanya.</p> <p>5 Q. And what did he say?</p> <p>6 A. He said, yes, he would.</p> <p>7 Q. At that time, was Tanya still</p> <p>8 employed by Temple?</p> <p>9 A. Yes.</p> <p>10 Q. So Tanya was still employed by Temple</p> <p>11 when you started to report to Dean</p> <p>12 Sadeghipour?</p> <p>13 A. Sadeghipour, yes, uh-huh.</p> <p>14 Q. Any other changes that Dean</p> <p>15 Sadeghipour made to your responsibilities?</p> <p>16 A. More events.</p> <p>17 Q. He asked you to plan more events?</p> <p>18 A. Events that had to do with finding</p> <p>19 the new, the new dean, department a new</p> <p>20 dean.</p> <p>21 Q. Anything else?</p> <p>22 A. A welcoming party to welcome the new</p> <p>23 dean; graduation.</p> <p>24 Q. You were -- you had worked on</p>

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<p>1 graduation for --</p> <p>2 A. For Allen.</p> <p>3 Q. -- Dean Nicholson, correct?</p> <p>4 A. Uh-huh, uh-huh.</p> <p>5 Q. Is that a "yes"?</p> <p>6 A. Yes. That is true.</p> <p>7 Q. So working on graduation was not a</p> <p>8 new responsibility for you?</p> <p>9 A. No, it was not.</p> <p>10 Q. Any other responsibilities that</p> <p>11 Dean Sadeghipour changed from Dean</p> <p>12 Nicholson?</p> <p>13 A. No.</p> <p>14 Q. You mentioned that one of the things</p> <p>15 you asked Dean Sadeghipour for was to not to</p> <p>16 have to -- to take away your supervisor role</p> <p>17 over Tanya.</p> <p>18 A. Yes.</p> <p>19 Q. Why?</p> <p>20 A. Because I felt that it was illegal.</p> <p>21 Q. You felt what was illegal?</p> <p>22 A. To call, contact the doctors. Well,</p> <p>23 I didn't feel. I knew it was, to do that.</p> <p>24 Q. And you told me there was only one</p>	<p>1 Q. Were there any other reasons that you</p> <p>2 asked Dean Sadeghipour to take away your</p> <p>3 supervisory role over Tanya?</p> <p>4 MR. MUNSHI: Beyond what she's</p> <p>5 already testified to?</p> <p>6 BY MS. FENDELL-SATINSKY:</p> <p>7 Q. Beyond -- you've told me that you</p> <p>8 felt -- that you asked Dean Sadeghipour to</p> <p>9 take away your supervisory role over Tanya</p> <p>10 because you felt it was illegal to contact</p> <p>11 her doctor, correct?</p> <p>12 A. Correct.</p> <p>13 MR. MUNSHI: Objection to</p> <p>14 form. She said other things.</p> <p>15 BY MS. FENDELL-SATINSKY:</p> <p>16 Q. Other than that --</p> <p>17 MS. FENDELL-SATINSKY: Let me</p> <p>18 finish my question.</p> <p>19 BY MS. FENDELL-SATINSKY:</p> <p>20 Q. Other than that, were there any other</p> <p>21 reasons that you asked Dean Sadeghipour to</p> <p>22 take away your supervisory role over Tanya?</p> <p>23 MR. MUNSHI: Objection to</p> <p>24 form.</p>
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<p>1 occasion on which Mr. Wacker asked you to</p> <p>2 call Tanya's doctor, correct?</p> <p>3 A. There was one time when he asked me</p> <p>4 to do that, but there were other pressures</p> <p>5 from him to get rid of her.</p> <p>6 Q. Okay. So, I want to go back to this.</p> <p>7 I asked you why you asked Dean</p> <p>8 Sadeghipour to take away your supervisory</p> <p>9 role over Tanya, and you said because you</p> <p>10 felt it was illegal to contact her doctor,</p> <p>11 correct?</p> <p>12 MR. MUNSHI: Objection to</p> <p>13 form.</p> <p>14 THE WITNESS: Yeah.</p> <p>15 BY MS. FENDELL SATINSKY:</p> <p>16 Q. And that was on the one occasion that</p> <p>17 we discussed earlier where Mr. Wacker --</p> <p>18 A. Yes.</p> <p>19 Q. -- asked you to do that?</p> <p>20 A. Yes.</p> <p>21 Q. Were there any other occasions on</p> <p>22 which anyone at Temple asked you to contact</p> <p>23 Tanya's doctor?</p> <p>24 A. No.</p>	<p>1 THE WITNESS: Yeah.</p> <p>2 MR. MUNSHI: Go ahead.</p> <p>3 THE WITNESS: Yes, yes.</p> <p>4 BY MS. FENDELL-SATINSKY:</p> <p>5 Q. Do you understand my question?</p> <p>6 A. Yes, I do.</p> <p>7 Q. Okay.</p> <p>8 A. It was to discipline her, write up,</p> <p>9 formally discipline her.</p> <p>10 Q. And who asked you to discipline her?</p> <p>11 A. Greg Wacker.</p> <p>12 Q. And what did he ask you to discipline</p> <p>13 her for?</p> <p>14 A. For absenteeism.</p> <p>15 Q. Was she absent?</p> <p>16 A. Yes.</p> <p>17 Q. Why did you not discipline her?</p> <p>18 A. Because she had intermittent family</p> <p>19 medical leave.</p> <p>20 Q. Did Mr. Wacker know that?</p> <p>21 A. He did.</p> <p>22 Q. Do you know what exactly her</p> <p>23 authorized intermittent FMLA leave was?</p> <p>24 A. Can you repeat the question?</p>

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<p>1 Q. Sure.</p> <p>2 Do you know how many days or hours</p> <p>3 she was permitted to be absent pursuant to</p> <p>4 her intermittent FMLA leave?</p> <p>5 A. It was intermittent. It could be --</p> <p>6 paid leave was until she used all of her</p> <p>7 vacation, and then afterwards she could</p> <p>8 still take off without pay.</p> <p>9 Q. Did you review Tanya's FMLA</p> <p>10 paperwork?</p> <p>11 A. No, I did not.</p> <p>12 Q. Did you know how much time her doctor</p> <p>13 authorized her to be off work?</p> <p>14 A. He add -- it was approved as</p> <p>15 intermittent. That means that it's not a</p> <p>16 specified period of time like May 1st to May</p> <p>17 15, that it, it rolls.</p> <p>18 Q. So when -- to you, does it mean that</p> <p>19 when somebody needs to take leave they're</p> <p>20 able to take leave?</p> <p>21 A. Say that again.</p> <p>22 Q. Sure.</p> <p>23 You understood -- how did you know</p> <p>24 that Tanya was on intermittent FMLA leave?</p>	<p>1 you're having an exacerbation or whatever.</p> <p>2 You just say, "I want" -- "I'm using my FMLA</p> <p>3 day today."</p> <p>4 Q. And when you took intermittent FMLA</p> <p>5 leave, was it your understanding that --</p> <p>6 what was your -- let me step back.</p> <p>7 What was your understanding of how</p> <p>8 much leave you could take pursuant to your</p> <p>9 FMLA leave?</p> <p>10 A. Paid or unpaid or both?</p> <p>11 Q. Both.</p> <p>12 A. There was -- I don't know exactly, to</p> <p>13 be honest with you.</p> <p>14 Q. When you went on intermittent FMLA</p> <p>15 leave, did you have to complete a form from</p> <p>16 a doctor?</p> <p>17 A. Yes.</p> <p>18 Q. And did that form specify how much</p> <p>19 leave you were entitled to?</p> <p>20 A. I don't know.</p> <p>21 Q. What was -- did you believe that you</p> <p>22 could take any day off when you were on</p> <p>23 intermittent FMLA leave?</p> <p>24 A. I mean -- any day? No. I know I had</p>
Page 122	Page 124
<p>1 A. Because I was told when I was hired.</p> <p>2 Q. Who told you that?</p> <p>3 A. I believe it was Greg.</p> <p>4 Q. And did Greg tell you anything else</p> <p>5 about Tanya's ability to take intermittent</p> <p>6 FMLA leave other than the fact that she had</p> <p>7 intermittent FMLA leave?</p> <p>8 A. He told me that he didn't believe</p> <p>9 her.</p> <p>10 Q. Anything else?</p> <p>11 A. And that he wanted me to find a</p> <p>12 reason to get rid of her.</p> <p>13 Q. Anything else Mr. Wacker told you</p> <p>14 about Tanya's intermittent FMLA leave other</p> <p>15 than what you've told me?</p> <p>16 A. No.</p> <p>17 Q. Have you ever taken intermittent FMLA</p> <p>18 leave at Temple?</p> <p>19 A. I have.</p> <p>20 Q. And when you're going to take</p> <p>21 intermittent leave, what's the process for</p> <p>22 reporting?</p> <p>23 A. You call, call in. If it's</p> <p>24 intermittent, you call in in the morning</p>	<p>1 to call in or...</p> <p>2 Q. Right. But other than calling in,</p> <p>3 did you believe you could take off whenever</p> <p>4 you wanted when you were on intermittent</p> <p>5 FMLA leave?</p> <p>6 A. I did if -- yes.</p> <p>7 Q. And did you believe the same for</p> <p>8 Tanya, that she could take off whenever she</p> <p>9 wanted?</p> <p>10 A. I be -- yes.</p> <p>11 Q. And where did that understanding come</p> <p>12 from with regard to Tanya?</p> <p>13 A. From the employee handbook.</p> <p>14 Q. What specifically in --</p> <p>15 A. Or maybe, maybe it was pol -- the</p> <p>16 policy for FMLA.</p> <p>17 Q. Did you ask anyone in H.R. about what</p> <p>18 Tanya was entitled to take under her FMLA</p> <p>19 leave?</p> <p>20 A. I did speak to someone in H.R.</p> <p>21 Q. Who?</p> <p>22 A. Deirdre Walton.</p> <p>23 Q. And what did Ms. Walton tell you</p> <p>24 about Tanya's FMLA leave?</p>

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<p>1 A. I don't recall. I think she referred 2 me back to Greg. 3 Q. And I believe you told me earlier, 4 but correct me if I'm wrong, that Mr. Wacker 5 didn't tell you -- he told you that -- let 6 me ask a cleaner question. 7 I believe you told me earlier, but 8 correct me if I'm wrong, that Mr. Wacker 9 told you that Tanya was on intermittent FMLA 10 leave, but he did not provide you with any 11 other specifics about her leave; is that 12 correct? 13 A. That's correct. 14 Q. Since you didn't review Tanya's FMLA 15 paperwork, you don't know exactly what kind 16 of leave she was entitled to, correct? 17 MR. MUNSHI: Just objection to 18 form. 19 THE WITNESS: That is 20 incorrect. 21 MS. FENDELL-SATINSKY: Okay. 22 THE WITNESS: I knew because I 23 asked Deirdre Walton. 24</p>	<p>1 anything about the medical information. 2 A. I didn't ask. Yeah. 3 Q. So you don't know what Tanya's 4 medical information said about when she was 5 entitled to leave, correct? 6 A. No, I don't. You're right. 7 Q. Going back to your work for Dean 8 Sadeghipour, how long did Dean Sadeghipour 9 stay in the role as the dean of College of 10 Science and Technology? 11 A. About 18 months. And I'm 12 approximating. 13 Q. After about 18 months, did someone 14 else become the dean of the College of 15 Science and Technology? 16 A. Yes. 17 Q. Who was that? 18 A. That was Hai-Lung, H-A-I, hyphen, 19 L-U-N-G. Last name is Dai, D-A-I. 20 Q. And when Dean Dai became the dean, 21 did you stay in your role as executive 22 assistant? 23 A. Yes. 24 Q. Did you have the same</p>
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<p>1 BY MS. FENDELL-SATINSKY: 2 Q. Well, you told me, Deirdre Walton, 3 you don't remember what Deirdre Walton 4 said 5 A. Yeah, I -- 6 Q. -- except that she referred you back 7 to Greg. 8 A. Okay. But now I'm remembering now. 9 I asked her if -- what was the difference 10 between FMLA and intermittent, and she told 11 me what the policy was. 12 Q. So what did she tell you? 13 A. The policy was if the person was sick 14 that morning, whatever -- I don't know what 15 her issue was. Whatever the issue you're on 16 Family Medical Leave for, that you can -- if 17 something comes up and your intermittent, 18 you call in that morning and say that you 19 need to take an FMLA day. And that's the 20 only explanation you have to give. 21 Q. Did Ms. Walton -- 22 A. The medical information is protected, 23 I was told. 24 Q. Sure. So she couldn't tell you</p>	<p>1 responsibilities for Dean Dai that you had 2 for Dean Sadeghipour? 3 A. They, they changed. 4 Q. How did they change? 5 A. Uhm, Dean Dai was the permanent dean, 6 so he was really trying to reach out to 7 alumni; get a board of visitors together, 8 because we didn't have a board of visitors. 9 So it was more external, a lot of external, 10 working with external constituents. 11 Q. Any other way that your 12 responsibilities changed? 13 A. A lot more travel. 14 Q. For you or for Dean -- 15 A. For Dr. Dai. 16 Q. So there was a lot more travel for 17 Dean Dai? 18 A. Yes. 19 Q. And were you responsible for booking 20 Dean Dai's travel? 21 A. Yes, I was. 22 Q. Were you responsible for booking 23 Dean Sadeghipour's travel? 24 A. No.</p>

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<p>1 Q. Was Dean Dai the first person that 2 you've booked travel for at Temple? 3 A. Yes. 4 Q. And when you booked travel for 5 Dean Dai, did that include flight 6 arrangements? 7 A. He did a lot of his own. He liked it 8 that way. But sometimes, yes, I did. 9 Q. Do you know why he liked to book his 10 travel on his own? 11 A. Because he liked to connect at 12 certain places. He had a lot of 13 conferences. So he would give me what he 14 found and ask me to book it for him once he 15 had the flights. 16 Q. Do you know why he didn't ask you to 17 initially search for flights? 18 A. Because he said he liked to find the 19 cheapest flight. That's what he told me. 20 Q. What did you think of Dean 21 Sadeghipour? 22 MR. MUNSHI: Just objection to 23 form. 24 THE WITNESS: I really liked</p>	<p>1 department. And that was all I knew, just 2 to help him get off. He was a new chair. 3 Q. Were you upset that Dean Dai had put 4 you on loan to Dr. Wu? 5 A. No, not at all. It was just that I 6 was forgotten. 7 Q. By who? 8 A. The dean's office. 9 Q. And by Dean Dai? 10 A. Dean Dai and Vice-Dean George 11 Palladino. 12 Q. In what way do you believe you were 13 forgotten? 14 A. Because I was told I was on loan, 15 and, like, you know, a year-and-a-half 16 passed. I'm like, When am I coming back? 17 But then I reported directly to Palladino at 18 that point. 19 Q. When did you start reporting to 20 Palladino? 21 A. When Dean Dai was appointed dean, the 22 permanent dean. 23 Q. When did that happen? 24 A. Oh, that happened -- once again,</p>
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<p>1 him. 2 BY MS. FENDELL-SATINSKY: 3 Q. Did you think he was fair? 4 A. Uh-huh. 5 Q. Is that a "yes"? 6 A. Yes. I'm sorry. 7 Q. What did you think of Dean Dai? 8 MR. MUNSHI: Same objection to 9 form. 10 You can answer. 11 THE WITNESS: I welcomed 12 Dean Dai with open arms. I was so 13 happy to see him. I could see the 14 dean's office was really going to 15 take off instead of just sort of 16 limping along. And I was very 17 excited, and I felt we had a really 18 good relationship initially. 19 BY MS. FENDELL-SATINSKY: 20 Q. And did that change at some point? 21 A. Uhm, towards the end, yes. 22 Q. And why did it change? 23 A. Because I was, because I was told I 24 was on loan to Dr. Wu in the other</p>	<p>1 year, I'm going to say he started January 2 1st of 2006 or '07. That was his official 3 date. 4 Q. And at that point in time, 5 Vice-Dean Palladino became your supervisor? 6 A. Well, Vice-Dean was there before 7 Dean Dai. He came in during the transition. 8 Q. Right. But did you start to report 9 to Vice-Dean Palladino in January 2006 or 10 2007? 11 A. Before. When Dr. Palladino came 12 over, I'm guessing, the fall before. When 13 he came over, I reported to him because 14 Dean Dai wasn't here -- there. 15 Q. And you did not report to -- was 16 there a time when there was no dean? 17 A. There were acting deans. 18 Q. Right. So, I understand Dean 19 Sadeghipour was an acting dean. 20 And he was there about 18 months, you 21 told me? 22 A. Yes. 23 Q. And then you told me after Dean 24 Sadeghipour, Dean Dai became the dean?</p>

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<p style="text-align: right;">Page 133</p> <p>1 A. Yeah. But Allen Nicholson was the 2 first interim dean. 3 Q. I understand. 4 A. Okay, okay. 5 Q. I'm focused on the time between 6 Dean Sadeghipour and Dean Dai. 7 A. Right. 8 Q. Was there any point in time when 9 there was no dean? 10 A. No. 11 Q. And did you begin to report to 12 Dean Palladino when Dean Dai became the 13 dean? 14 A. Dean Dai became the dean, was 15 announced the dean, but he was transitioning 16 from Penn; so Dr. Palladino was on the 17 ground. He was the boots on the ground for 18 Dr. Wu -- for Dr. Dai, so I reported to him. 19 Q. So when did you begin reporting to 20 Dr. Palladino? 21 A. So, October -- I'm thinking 22 September, October of 2006-'07. 23 Q. And then once Dr. -- once Dean Dai 24 came on, then did you report to Dean Dai or</p>	<p style="text-align: right;">Page 135</p> <p>1 A. Yes. 2 Q. And you said after about a 3 year-and-a-half in that role you wanted to 4 go -- well, let me ask you: Did there come 5 a point in time when you understood that you 6 were going to be Dr. Wu's executive 7 assistant? 8 A. Well, temporarily, immediately when 9 he asked. 10 Q. Okay. Well, did there come a point 11 in time when you understood that was going 12 to be your permanent position? 13 A. Not officially, no. 14 Q. So no one ever told you that your 15 role was to be Dr. Wu's executive assistant; 16 is that your testimony? 17 A. That is. 18 Q. So the whole time that you worked for 19 Dr. Wu, you believed that you were on loan 20 to him? 21 A. For the first 18 months, I did, yeah. 22 Q. And then what did you believe after 23 the first 18 months? 24 A. I felt forgotten.</p>
<p style="text-align: right;">Page 134</p> <p>1 did you continue to report to Dr. -- 2 A. I continued -- 3 Q. -- Palladino? 4 A. -- to report to Palladino. 5 Q. Let me finish my questions. 6 A. I'm sorry. 7 Q. That's okay. 8 What did you think of Dean Palladino 9 as a supervisor? 10 A. He was a tough guy, but I liked him. 11 Q. Did you think -- 12 A. He was -- go ahead. 13 Q. I'm sorry. Go ahead. It sounded 14 like you were going to say something else. 15 A. Yeah, yeah. I just thought he was a 16 good guy. 17 Q. Did you think he was fair? 18 A. He was fair. 19 Q. When did you -- when were you, what 20 you said, given on loan to Dr. Wu? 21 A. That would have been the end of 22 August/beginning of September of 2009. 23 Q. At that point in time, did Dean Wu 24 become your supervisor?</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. Okay. So did you believe that you 2 were on loan after the first 18 months? 3 A. No, I did not anymore. 4 Q. So what did you believe then after 5 the first 18 months? 6 A. That I was there, I was -- it was 7 permanent. 8 Q. So that you were going to be Dr. Wu's 9 permanent executive assistant? 10 A. Right, exactly. 11 Q. As Dr. Wu's executive assistant, did 12 you have the same kinds of responsibilities 13 you had had for Dean Nicholson -- 14 A. Yes. 15 Q. -- Dr. Palladino, and Dean -- 16 A. Sadeghipour. 17 Q. -- Sadeghipour? 18 MR. MUNSHI: Objection to 19 form. 20 Go ahead and answer. 21 THE WITNESS: Yes. 22 BY MS. FENDELL-SATINSKY: 23 Q. So you were responsible for Dr. Wu's 24 travel?</p>

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<p>1 A. Yes.</p> <p>2 Q. Were you responsible for Dr. Wu's</p> <p>3 expense reports?</p> <p>4 A. Yes.</p> <p>5 Q. And for checking the status of those</p> <p>6 expense reports?</p> <p>7 A. Yes.</p> <p>8 Q. Were you responsible for editing</p> <p>9 papers for Dr. Wu?</p> <p>10 A. Yes.</p> <p>11 Q. Had you done that for any of the</p> <p>12 prior individuals you had been an executive</p> <p>13 assistant for?</p> <p>14 A. No.</p> <p>15 Q. So editing papers was a new task to</p> <p>16 you?</p> <p>17 A. Yes.</p> <p>18 Q. And editing papers, did that require</p> <p>19 a lot of focus?</p> <p>20 A. Yes.</p> <p>21 Q. And that's a very detail-oriented --</p> <p>22 A. Yes.</p> <p>23 Q. -- responsibility, correct?</p> <p>24 A. Yes.</p>	<p>1 distinguished guest from another university</p> <p>2 come in.</p> <p>3 Q. Did that change your responsibilities</p> <p>4 or did it just make the events themselves</p> <p>5 different?</p> <p>6 A. Just different, just different.</p> <p>7 Q. So it did not change your</p> <p>8 responsibilities in regard to organizing the</p> <p>9 events?</p> <p>10 A. No.</p> <p>11 Q. And in your role as executive</p> <p>12 assistant for Dr. Wu, you didn't have any</p> <p>13 responsibility for staff supervision --</p> <p>14 A. No.</p> <p>15 Q. -- correct?</p> <p>16 A. No, I did not.</p> <p>17 Q. Were you the only executive assistant</p> <p>18 for Dr. Wu?</p> <p>19 A. Yes.</p> <p>20 Q. So Dr. Wu did not have any other</p> <p>21 executive assistants while you were his</p> <p>22 executive assistant?</p> <p>23 A. That is correct.</p> <p>24 Q. Did anyone else report to Dr. Wu</p>
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<p>1 Q. For Dr. Wu, did you continue to</p> <p>2 organize events?</p> <p>3 A. Yes.</p> <p>4 Q. And meetings?</p> <p>5 A. Yes.</p> <p>6 Q. And organizing events and meetings,</p> <p>7 did that include ordering food?</p> <p>8 A. Yes.</p> <p>9 Q. Did that include arranging food?</p> <p>10 A. Yes.</p> <p>11 Q. Did that include making the event</p> <p>12 look presentable?</p> <p>13 A. Yes.</p> <p>14 Q. And those tasks you had done for the</p> <p>15 prior deans of the college, correct?</p> <p>16 A. Yes.</p> <p>17 Q. So those were not new tasks to you?</p> <p>18 A. They were different kinds of events,</p> <p>19 but yes.</p> <p>20 Q. In what way were they different kinds</p> <p>21 of events?</p> <p>22 A. Rather than being collegial, they</p> <p>23 were more focused on colloquium, maybe</p> <p>24 having speak -- you know, maybe a</p>	<p>1 while you reported to him?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Is that a "yes"?</p> <p>4 A. Yeah. I'm sorry.</p> <p>5 Q. That's okay.</p> <p>6 A. "Yes."</p> <p>7 Q. Who else?</p> <p>8 A. I don't know all of them, but I can</p> <p>9 tell you the ones I know.</p> <p>10 Q. Sure.</p> <p>11 A. Judy Lennon; uhm, Jackie Hariz - and</p> <p>12 that's H-A-R-R-I-Z, as in zebra - Alexandra</p> <p>13 Grinshpun, G-R-I-N-S-P-H-U-N (sic); Laurie</p> <p>14 Shteir; Associate Chair Justin Shi; and</p> <p>15 Eugene Kwatny. Both associate chairs, I'm</p> <p>16 sorry.</p> <p>17 Q. The two associate chairs, were they</p> <p>18 directly below Dr. Wu?</p> <p>19 A. Yes.</p> <p>20 Q. So they were senior to you?</p> <p>21 A. They were senior, uh-huh.</p> <p>22 Q. And when I say "senior," I'm talking</p> <p>23 about the definition you gave me earlier of</p> <p>24 "senior."</p>

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<p>1 A. Yes.</p> <p>2 Q. Laurie Shteir, what was her job?</p> <p>3 A. She was an adjunct professor and a</p> <p>4 coordinator of the lab programs, I believe</p> <p>5 her title was.</p> <p>6 Q. And in that role, she had different</p> <p>7 responsibilities than you had, correct?</p> <p>8 A. Yes, yeah. Much different.</p> <p>9 Q. Who is Alexandra Grinshpun?</p> <p>10 A. Grinshpun, she was the business</p> <p>11 manager for the department for a short</p> <p>12 period of time.</p> <p>13 Q. And she had different</p> <p>14 responsibilities than you, correct?</p> <p>15 A. Yes.</p> <p>16 Q. Was she replaced by somebody else?</p> <p>17 A. Drew DiMeo.</p> <p>18 Q. When did Drew replace her?</p> <p>19 A. I'm going to say 2010-ish.</p> <p>20 Q. And when Drew DiMeo became the</p> <p>21 business manager, did he assume Alexandra's</p> <p>22 responsibilities?</p> <p>23 MR. MUNSHI: Just objection to</p> <p>24 form.</p>	<p>1 A. Yes.</p> <p>2 Q. What position did Jackie Harriz --</p> <p>3 A. Harriz?</p> <p>4 Q. -- have?</p> <p>5 A. She worked with the graduate</p> <p>6 students. She did like the F-1 visas and</p> <p>7 J-1s. That's what she did with the</p> <p>8 department.</p> <p>9 Q. Do you know what her title was?</p> <p>10 A. I think it was coordinator of</p> <p>11 international students in our department.</p> <p>12 Q. And earlier you told me Judy Lennon</p> <p>13 was a secretary, correct?</p> <p>14 A. Right, the department secretary.</p> <p>15 Q. Of the -- were there any other</p> <p>16 employees who reported to Dr. Wu during the</p> <p>17 time you were Dr. Wu's executive assistant?</p> <p>18 A. On the hierarchy chart, all the</p> <p>19 faculty did, so...</p> <p>20 Q. Anyone else? Was there anyone else</p> <p>21 within the office that was not a faculty</p> <p>22 member?</p> <p>23 A. Well, when Alexandra was there, she</p> <p>24 reported to him. I think even the people in</p>
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<p>1 But go ahead.</p> <p>2 THE WITNESS: They were</p> <p>3 different, because he didn't come</p> <p>4 into the office. He stayed in the</p> <p>5 dean's office.</p> <p>6 BY MS. FENDELL-SATINSKY:</p> <p>7 Q. Otherwise, did his -- in your</p> <p>8 opinion, did his responsibilities change</p> <p>9 from Alexandra's?</p> <p>10 A. Yes.</p> <p>11 Q. In what way?</p> <p>12 A. He just was not -- you know, I don't</p> <p>13 know how to answer that question, to be</p> <p>14 honest.</p> <p>15 Q. So you don't --</p> <p>16 A. He just wasn't visible. He wasn't</p> <p>17 physically located there, so...</p> <p>18 Q. But you don't personally know whether</p> <p>19 his responsibilities changed from</p> <p>20 Alexandra's?</p> <p>21 A. That is correct.</p> <p>22 Q. And Mr. DiMeo's job, in Mr. DiMeo's</p> <p>23 job was he doing tasks and responsibilities</p> <p>24 different than yours?</p>	<p>1 the labs below us reported to him, but I</p> <p>2 can't say for sure.</p> <p>3 Q. But Judy, Jackie, Alexandra, Laurie,</p> <p>4 Justin, and Eugene were the people in the</p> <p>5 office; is that accurate?</p> <p>6 A. Eugene Kwatny was on a different</p> <p>7 floor, but he was associate chair of the</p> <p>8 department.</p> <p>9 Q. But you were all associated together</p> <p>10 as being --</p> <p>11 A. Yes.</p> <p>12 Q. -- a part of --</p> <p>13 A. That's correct.</p> <p>14 Q. -- part of Dr. Wu's office?</p> <p>15 A. Yes.</p> <p>16 Q. Is that correct?</p> <p>17 A. That's correct.</p> <p>18 Q. Okay. So was there anyone else who</p> <p>19 you considered to be part of Dr. Wu's office</p> <p>20 during the time you were Dr. Wu's executive</p> <p>21 assistant?</p> <p>22 A. I'm just going through in my head.</p> <p>23 Q. Sure.</p> <p>24 A. I think the student workers. I can't</p>

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<p>1 say for sure, but I would think.</p> <p>2 Uhm, Tom, what is Tom's last name?</p> <p>3 Well, the, uhm, like, technical people in</p> <p>4 our department, John Ikoniak, he reported to</p> <p>5 Dr. Wu. Tom Stauffer to Dr. Wu.</p> <p>6 Q. Was he a technical person, too?</p> <p>7 A. Yes.</p> <p>8 Q. And were they -- did they work in IT?</p> <p>9 A. Yes, uh-huh.</p> <p>10 Q. Did you have any IT responsibilities</p> <p>11 during the time you were Dr. Wu's executive</p> <p>12 assistant?</p> <p>13 A. No.</p> <p>14 Q. Anyone else you can think of who was</p> <p>15 part of Dr. Wu's office during the time you</p> <p>16 were Dr. Wu's executive assistant?</p> <p>17 A. Uhm, yeah. Hailey King.</p> <p>18 Q. What job did Ms. King have?</p> <p>19 A. She took Jackie Harriz's position,</p> <p>20 which was the same thing, coordinating the</p> <p>21 visas and stuff like that.</p> <p>22 Q. Anyone else?</p> <p>23 A. The adjuncts, did I say that? The</p> <p>24 adjunct professors.</p>	<p>1 Q. -- correct?</p> <p>2 A. Yes.</p> <p>3 Q. And then you told me that Justin Shi</p> <p>4 and Eugene Kwatny were directly below</p> <p>5 Dr. Wu?</p> <p>6 A. Yes.</p> <p>7 Q. Who came in the hierarchy after</p> <p>8 Dr. -- after Justin Shi and Eugene Kwatny?</p> <p>9 A. I would say faculty, tenure track,</p> <p>10 our tenure, our tenure track faculty.</p> <p>11 Q. Where did Laurie Shteir fall in the</p> <p>12 chain of command?</p> <p>13 A. She was a quasi faulty staff</p> <p>14 position; so she reported directly to him, I</p> <p>15 know that.</p> <p>16 Q. Did you re -- did you view Laurie</p> <p>17 Shteir as senior to you?</p> <p>18 A. No, I did not.</p> <p>19 Q. Did you view her as a peer?</p> <p>20 A. Yes.</p> <p>21 Q. And do you know if Laurie Shteir had</p> <p>22 any -- has any advanced degrees?</p> <p>23 A. I believe she has a master's degree.</p> <p>24 Q. Do you have a master's degree?</p>
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<p>1 Q. Anyone else that you can remember?</p> <p>2 A. I'm just going through the staff in</p> <p>3 my head.</p> <p>4 Q. Uli-luli.</p> <p>5 A. Oh, Sally Kyvernitis.</p> <p>6 Q. What was Sally's job?</p> <p>7 A. I'm going to spell her last. It's</p> <p>8 K-Y-V-E-R-T-I-N-I-S (sic). Sally was the</p> <p>9 coordinator for our undergraduate students</p> <p>10 to make sure they got their credits and</p> <p>11 could graduate on time.</p> <p>12 Q. Anyone else?</p> <p>13 A. I think that's everyone in the</p> <p>14 department.</p> <p>15 Q. Sally's responsibilities were</p> <p>16 different than yours, correct?</p> <p>17 A. Oh, yes, uh-huh.</p> <p>18 Q. And Judy Lennon's responsibilities,</p> <p>19 hers were different than yours too, right?</p> <p>20 A. Yes.</p> <p>21 Q. In terms of the hierarchy, I</p> <p>22 understand Dr. Wu was at the top of the</p> <p>23 hierarchy --</p> <p>24 A. Uh-huh.</p>	<p>1 A. I'm short of some credits.</p> <p>2 Q. So you don't have a master's degree?</p> <p>3 A. I don't have my master's degree,</p> <p>4 uh-uh.</p> <p>5 Q. Alexandra Grinshpun, was she senior</p> <p>6 to you?</p> <p>7 A. Yes.</p> <p>8 Q. And, again, when I use the word</p> <p>9 "senior" --</p> <p>10 A. Yes, she was.</p> <p>11 Q. -- I'm using your definition.</p> <p>12 A. Yes, she was.</p> <p>13 Q. Do you understand that moving forward</p> <p>14 if I use the word "senior," unless I tell</p> <p>15 you otherwise, I'm referring to the</p> <p>16 definition you gave me earlier?</p> <p>17 A. Right, I understand.</p> <p>18 Q. So you said Alexandra was senior to</p> <p>19 you, correct?</p> <p>20 A. Yes.</p> <p>21 Q. And so Drew was senior to you as</p> <p>22 well?</p> <p>23 A. My grade level was higher than his.</p> <p>24 I don't know if --</p>

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<p>1 Q. What's a grade level?</p> <p>2 A. I -- we had a T -- for staff members</p> <p>3 who were salary, there was a T level who</p> <p>4 weren't faculty; and I was a T-26, which I</p> <p>5 believe was the first level of management.</p> <p>6 And when Drew started, he was like maybe a</p> <p>7 T-23 or 4, I'm not sure, but he was</p> <p>8 definitely below me.</p> <p>9 Q. You said that T-26 is a first tier of</p> <p>10 management?</p> <p>11 A. I believe so.</p> <p>12 Q. But Mr. DiMeo's position was business</p> <p>13 manager, correct?</p> <p>14 A. Assistant.</p> <p>15 Q. Is that what Alexandra's position</p> <p>16 was, assistant business manager?</p> <p>17 A. Oh, I thought -- I'm sorry. I</p> <p>18 thought you were talking about at the</p> <p>19 college. I'm sorry. He was business</p> <p>20 manager for us, you are correct.</p> <p>21 Q. So Drew DiMeo's position was business</p> <p>22 manager?</p> <p>23 A. For the department, yes.</p> <p>24 Q. And you -- did you view Drew DiMeo</p>	<p>1 Q. Could Drew DiMeo give you</p> <p>2 assignments?</p> <p>3 A. Through Dr. Wu.</p> <p>4 Q. Could Jackie Harritz give you</p> <p>5 assignments?</p> <p>6 A. We didn't -- no. We didn't work</p> <p>7 together.</p> <p>8 Q. Jackie Harritz, did you view her as</p> <p>9 senior to you?</p> <p>10 A. I viewed her as a peer.</p> <p>11 Q. And Judy Lennon, did you view her as</p> <p>12 senior to you?</p> <p>13 A. No.</p> <p>14 Q. Did you view her as a peer?</p> <p>15 A. Yes.</p> <p>16 Q. Sally --</p> <p>17 A. Kyvernitis.</p> <p>18 Q. -- Kyvernitis --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- did you view her as senior to you?</p> <p>21 A. Yes.</p> <p>22 Q. And Hailey King, did you view her as</p> <p>23 senior to you?</p> <p>24 A. No, I did not.</p>
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<p>1 as -- well, did you view yourself as senior</p> <p>2 to Drew DiMeo?</p> <p>3 A. Frankly, I never thought about it.</p> <p>4 Q. Thinking about it now, did you</p> <p>5 view -- do you view yourself as having been</p> <p>6 senior to Drew DiMeo?</p> <p>7 A. I was.</p> <p>8 Q. In what way?</p> <p>9 A. If I look at the T schedule, you</p> <p>10 know, T scale.</p> <p>11 Q. Could you give Mr. DiMeo assignments?</p> <p>12 A. No.</p> <p>13 Q. Could you give Alexandra Grinshpun</p> <p>14 assignments?</p> <p>15 A. No.</p> <p>16 Q. Could you give Laurie Shteir</p> <p>17 assignments?</p> <p>18 A. No.</p> <p>19 Q. Could Laurie Shteir give you</p> <p>20 assignments?</p> <p>21 A. Through Dr. Wu, yes.</p> <p>22 Q. Could Alexandra Grinshpun give you</p> <p>23 assignments?</p> <p>24 A. Through Dr. Wu.</p>	<p>1 Q. Did you view her as a peer?</p> <p>2 A. Yes.</p> <p>3 Q. And when Hailey King started working</p> <p>4 at Temple, did she assume Jackie Harritz's</p> <p>5 role?</p> <p>6 A. Yes.</p> <p>7 Q. And Jackie Harritz's responsibilities?</p> <p>8 A. Yes. With the one caveat I didn't</p> <p>9 see their -- I mean, I don't -- I'm</p> <p>10 assuming. We were introduced to them. So,</p> <p>11 I don't have access to files, if that's what</p> <p>12 you're --</p> <p>13 Q. No, I understand. I'm asking you --</p> <p>14 A. Okay.</p> <p>15 Q. -- how you view them.</p> <p>16 A. Okay.</p> <p>17 Q. And you told me how you viewed --</p> <p>18 A. Okay.</p> <p>19 Q. -- people.</p> <p>20 MS. FENDELL-SATINSKY:</p> <p>21 (Indicating).</p> <p>22 MR. MUNSHI: Thank you.</p> <p>23 THE COURT REPORTER: This is</p> <p>24 three.</p>

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<p>1 - - -</p> <p>2 (Whereupon, 10/20/09 email</p> <p>3 regarding Ruth Briggs, Bates No.</p> <p>4 TEMPLE0081-86, was marked as D</p> <p>5 Exhibit No. 3 for identification.)</p> <p>6 - - -</p> <p>7 BY MS. FENDELL-SATINSKY:</p> <p>8 Q. Ms. Briggs, the court reporter has</p> <p>9 given you a document that's been marked as</p> <p>10 D-3, and I want you to take a look at it.</p> <p>11 It's a couple of pages. And, again, let me</p> <p>12 know whether you've ever seen the document</p> <p>13 before.</p> <p>14 A. (Brief pause while reading.)</p> <p>15 No. I don't remember seeing it. I</p> <p>16 feel surprised.</p> <p>17 Q. You said you're surprised?</p> <p>18 A. Uh-huh.</p> <p>19 Q. What are you surprised by?</p> <p>20 A. That I -- it's about me, but I wasn't</p> <p>21 informed.</p> <p>22 Q. Well, read, read the next few pages</p> <p>23 and let me know if you've seen the next few</p> <p>24 pages.</p>	<p>1 BY MS. FENDELL-SATINSKY:</p> <p>2 Q. Well, I just want --</p> <p>3 A. Okay.</p> <p>4 Q. I just want you to read it.</p> <p>5 A. Okay. I read it.</p> <p>6 Q. And when you're done reading it --</p> <p>7 A. Okay.</p> <p>8 Q. -- let me know you're finished</p> <p>9 reading it.</p> <p>10 A. Yup, yup.</p> <p>11 Q. You're finished?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Is that a "yes"?</p> <p>14 A. Yes, it is.</p> <p>15 Q. Is there anything in this description</p> <p>16 that's inaccurate?</p> <p>17 A. Screening phone calls.</p> <p>18 Q. What page are you on?</p> <p>19 A. I'm on, uhm, 0082.</p> <p>20 Q. Okay. So you did not screen phone</p> <p>21 calls?</p> <p>22 A. For his phone only, not for the</p> <p>23 department.</p> <p>24 Q. So you screened Dr. Wu's phone calls,</p>
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<p>1 A. Okay. My job description.</p> <p>2 Q. Okay. So you haven't seen the cover</p> <p>3 email that's marked as TEMPLE0081?</p> <p>4 A. That is correct.</p> <p>5 Q. But you have seen what you called</p> <p>6 your "job description" that's been marked as</p> <p>7 TEMPLE0082 to TEMPLE0086?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 MR. MUNSHI: Just wait for a</p> <p>11 question. Just wait.</p> <p>12 BY MS. FENDELL-SATINSKY:</p> <p>13 Q. I want you to read this through, and</p> <p>14 when you're done --</p> <p>15 A. Okay.</p> <p>16 Q. -- taking a look at it, uhm, let me</p> <p>17 know.</p> <p>18 A. (Brief pause while reading.)</p> <p>19 Can I use someone's pen to check off</p> <p>20 the ones I want to talk about?</p> <p>21 Q. Well, I --</p> <p>22 MR. MUNSHI: Just wait for the</p> <p>23 question.</p> <p>24</p>	<p>1 but not the department's phone calls?</p> <p>2 A. Yes.</p> <p>3 Q. So I want to know everything in here</p> <p>4 or anything in here that you feel is</p> <p>5 inaccurate.</p> <p>6 A. I did not coordinate student workers'</p> <p>7 schedules, which is on 0082 also.</p> <p>8 Q. Okay.</p> <p>9 A. Okay. This is a generic one. I</p> <p>10 didn't have any direct reports, it says on</p> <p>11 the last, 0085.</p> <p>12 Once again, it says, coordinate and</p> <p>13 monitor student worker and rules. Uhm --</p> <p>14 Q. Is that on 00852 (sic)?</p> <p>15 A. Yes. Yes, it is. It's in that</p> <p>16 paragraph, the last paragraph.</p> <p>17 Q. The paragraph that says "job</p> <p>18 qualifications"?</p> <p>19 A. Yes.</p> <p>20 Uhm, "Establishes priorities for</p> <p>21 direct reports," I didn't have any.</p> <p>22 Q. Anything else in here other than what</p> <p>23 you've told me that is inaccurate?</p> <p>24 A. Well, that, most of that sentence</p>

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<p>1 that we were just talking about, 2 "establishes priorities for direct reports," 3 that's not true. "Assigning and directing 4 work," I didn't do that. I did not appraise 5 performance; I did not provide training; and 6 I -- "insuring all projects are completed in 7 a timely fashion," within -- I could, you 8 know -- if I were the only -- I took my, my 9 timeline seriously, but -- 10 Q. Sure. 11 A. -- sometimes it was a group. 12 Q. So on your own projects, you were 13 insuring for -- you were responsible for 14 insuring that projects were completed 15 timely? 16 A. I was. 17 Q. And when you were in a group, your 18 feeling is that you were not responsible for 19 that? 20 A. Well, no. I was assigned a certain 21 task of the whole project. 22 Q. And so you would complete the task 23 and then -- 24 A. Whatever my -- you're right.</p>	<p>1 when you reported to Dr. Wu, correct? 2 A. Well, I -- this is a generic, a 3 generic job description, pretty much. I 4 mean, I asked for it, to be honest with you. 5 Uhm, they did put in "for the department and 6 chair" of that department. 7 Q. So does this job description 8 summarize the responsibilities that you had 9 as executive assistant to Dr. Wu other than 10 the points that you've told me are not 11 accurate? 12 A. "Remain abreast of all staff 13 schedules within the office," that was 14 not -- I -- not my responsibility. 15 Q. Do you need me to ask my question 16 again? 17 A. I didn't answer it right? Oh. 18 Q. Why don't -- 19 MS. FENDELL-SATINSKY: Can you 20 read back my question? 21 THE COURT REPORTER: Uh-huh. 22 --- 23 (Whereupon, the court reporter 24 read the following:</p>
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<p>1 Q. -- let the group move on? 2 A. That is true. 3 Q. So you wouldn't follow up with the 4 group to see where they were? 5 A. Oh, no. That's not -- no. I 6 thought -- we worked in a group. It would 7 be like a group, you know, session, and 8 there would be assigned things and... 9 Q. So when you worked in a group, did 10 you feel it was your responsibility to 11 complete the project in a timely fashion? 12 A. My portion of it, yes. 13 Q. But you didn't feel it was your 14 over -- it was your responsibility to insure 15 the group's overall project was completed 16 timely? 17 A. No; because I didn't supervise them. 18 Q. Other than the responsibilities that 19 you've told me were inaccurate, you 20 understood that the other responsibilities 21 in here were part of your job and 22 expectations you needed to meet, correct? 23 A. Yes. 24 Q. And this was your job description</p>	<p>1 Q So does this job 2 description summarize the 3 responsibilities that you had as 4 executive assistant to Dr. Wu other 5 than the points that you've told me 6 are not accurate?) 7 --- 8 THE WITNESS: I told you them 9 all, right? I don't know what 10 the -- understand what -- 11 BY MS. FENDELL-SATINSKY: 12 Q. So my question is: Does this job 13 description accurately summarize the job 14 that you had as Dr. Wu's executive assistant 15 other than what you've told me were not part 16 of your job? 17 A. Okay. So I told you that screening 18 phone calls, right, was one? 19 Q. You told me, screening phone calls, 20 you only screen Dr. Wu's phone calls -- 21 A. Right. 22 Q. -- not the department's phone calls. 23 You told me you did not remain abreast of 24 all staff schedules within the office; you</p>

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<p>1 did not coordinate and monitor student 2 workers' schedules and rules; you did not 3 have any direct reports; you did not monitor 4 student workers; and the last sentence of 5 job qualifications that relates to 6 establishing priorities for direct reports, 7 assigning and directing work, appraising 8 performance, and providing training and 9 feedback did not apply to you. 10 A. Correct. 11 Q. Other than those -- 12 A. I'm sorry. 13 Q. -- those tasks, is this document 14 that's Bates numbered TEMPLE002 (sic) to 15 TEMPLE006 (sic) an accurate description of 16 your job as executive assistant for Dr. Wu? 17 A. Yes. With those exceptions, yes. 18 Q. And so other than the exceptions you 19 gave me, you understood these 20 responsibilities to be part of your job for 21 Dr. Wu? 22 A. Yes. 23 Q. And you understood that Dr. Wu 24 expected you to complete them well and to</p>	<p>1 your job as executive assistant for Dr. Wu? 2 MR. MUNSHI: Just objection to 3 form. 4 You can answer if you 5 understand. 6 THE WITNESS: Okay. 7 Accountability; clear communication. 8 First off, I think they're all 9 important, but clear communication. 10 Is there anything here about 11 confidentiality? 12 BY MS. FENDELL-SATINSKY: 13 Q. So, I'm just going to take what I 14 said back earlier. So I had said that the 15 core competencies list goes on to 16 TEMPLE0085. 17 A. Uh-huh. 18 Q. But the core competencies list only 19 goes on to TEMPLE0084, and then it says 20 "Role Competencies." 21 A. Right. 22 Q. Do you see that? 23 A. Uh-huh. 24 Q. So the core competencies just go from</p>
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<p>1 the best of your ability? 2 A. Yes. 3 Q. If you go to TEMPLE003 (sic). 4 A. (Witness complies with request.) 5 MR. MUNSHI: 0083? 6 MS. FENDELL-SATINSKY: 0083, 7 sorry. 8 BY MS. FENDELL-SATINSKY: 9 Q. It says "core competencies." 10 A. Uh-huh. 11 Q. Do you see that? 12 A. Uh-huh. 13 Q. Is that a "yes"? 14 A. Yes, it is. I'm sorry. 15 Q. And it lists from TEMPLE0083 to 0085 16 various core competencies. 17 Do you see that? 18 A. Yes, I do. 19 Q. And those include accountability and 20 dependability upon others -- in addition to 21 others, right? 22 A. Yes. 23 Q. Of the core competencies listed, 24 which did you feel was the most important in</p>	<p>1 TEMPLE0083 to the top of TEMPLE0084. 2 A. Uh-huh. 3 Q. So, I understand from the core 4 competencies you've told me so far that you 5 think accountability and clear communication 6 are two of the most important, although I 7 recognize you testified that you think 8 they're all important. 9 Are there any others in addition to 10 accountability and clear communication that 11 you think are the most important? 12 A. I would say handles complex issues 13 that impact the department, university, and 14 external constituents. 15 Q. Where is that? 16 A. That would be on 0083. It's the 17 second one down. 18 Q. So, do you see that core competencies 19 starts after that? 20 A. Yes, I do. 21 Q. So "handles complex issues that have 22 impact to the department, university" is, if 23 you go back, an essential function, not a 24 core competency?</p>

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<p>1 A. Yes, it would be, yes.</p> <p>2 Q. So according to the job description,</p> <p>3 "handles complex issues" is an essential</p> <p>4 function of the job, not a core</p> <p>5 competency --</p> <p>6 A. Yes.</p> <p>7 Q. -- correct?</p> <p>8 A. Yes.</p> <p>9 Q. So, again, of the core competencies,</p> <p>10 which do you feel are the most important in</p> <p>11 addition to accountability and</p> <p>12 dependability?</p> <p>13 MR. MUNSHI: Just objection to</p> <p>14 form.</p> <p>15 Go ahead and answer.</p> <p>16 THE WITNESS: Okay, okay.</p> <p>17 Uhm, "respect and valuing</p> <p>18 diversity" -- oh, wait a minute.</p> <p>19 We're still in the core</p> <p>20 competencies, right?</p> <p>21 MS. FENDELL-SATINSKY: Right.</p> <p>22 BY MS. FENDELL-SATINSKY:</p> <p>23 Q. And respect and valuing diversity is</p> <p>24 a part of, is a core competency on the job</p>	<p>1 Q. And since Dr. Wu was a busy person,</p> <p>2 it was also important for you to keep him</p> <p>3 organized, correct?</p> <p>4 A. Yes.</p> <p>5 Q. And that was one of your</p> <p>6 responsibilities, right?</p> <p>7 A. Yes.</p> <p>8 Q. And if Dr. Wu was more organized, he</p> <p>9 could be more effective, did you feel?</p> <p>10 A. Yes.</p> <p>11 Q. And if he was more effective, did you</p> <p>12 feel that would reflect well on both of you?</p> <p>13 A. Yes.</p> <p>14 Q. Where did you physically work when</p> <p>15 you worked for Dr. Wu?</p> <p>16 A. Two different places. Initially, I</p> <p>17 worked outside of his office on the third</p> <p>18 floor in Walkman Hall.</p> <p>19 Q. Did you work physically somewhere</p> <p>20 else?</p> <p>21 A. Yes.</p> <p>22 Q. Where was that?</p> <p>23 A. Uhm, it was Thanks -- the night</p> <p>24 before Thanksgiving of, let me see, 2007, I</p>
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<p>1 description.</p> <p>2 A. Dependability; clear communication --</p> <p>3 they're all. Problem-solving;</p> <p>4 decision-making; and team work is always</p> <p>5 important. Yeah.</p> <p>6 Q. As Dr. Wu's executive assistant, you</p> <p>7 had a lot of responsibility?</p> <p>8 A. I did.</p> <p>9 Q. Uhm, and a lot of different kinds of</p> <p>10 responsibilities?</p> <p>11 A. Yes.</p> <p>12 Q. And you understood that your job was</p> <p>13 essential to Dr. Wu's job?</p> <p>14 A. Yes, I did.</p> <p>15 Q. And Dr. Wu, was he a busy person?</p> <p>16 A. Very busy.</p> <p>17 Q. He had a busy schedule?</p> <p>18 A. Very busy.</p> <p>19 Q. So it was very important to manage</p> <p>20 his schedule correctly, right?</p> <p>21 A. Yes.</p> <p>22 Q. And that was part of your</p> <p>23 responsibility?</p> <p>24 A. That was part, yes.</p>	<p>1 think -- no, that couldn't be right. 2010,</p> <p>2 it would be. He moved me to the 10th floor</p> <p>3 of Walkman Hall, another building.</p> <p>4 Q. Did he explain why he moved you?</p> <p>5 A. Because I was in the center of all</p> <p>6 the hubbub, so this was -- I could -- it was</p> <p>7 quiet.</p> <p>8 Q. So that could help you focus?</p> <p>9 A. Right, to -- yes.</p> <p>10 Q. And did you feel that could help you</p> <p>11 focus more?</p> <p>12 A. It -- yes.</p> <p>13 Q. And did it help you focus more?</p> <p>14 A. Yes.</p> <p>15 Q. So, uh, is it accurate to say that</p> <p>16 you were pleased with the physical move of</p> <p>17 your office?</p> <p>18 A. It was -- yes.</p> <p>19 Q. And was it less noisy on the 10th</p> <p>20 floor?</p> <p>21 A. Yes.</p> <p>22 Q. And did that help you focus more?</p> <p>23 A. Yes.</p> <p>24 Q. How old is Dr. Wu?</p>

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<p style="text-align: right;">Page 169</p> <p>1 A. I'm going to guess. I think he's 60 2 now, maybe 59. 3 Q. During the time that you were 4 Dr. Wu's executive assistant, what was your 5 impression of what his job was? 6 A. He was the -- had all the functions 7 of a department chair. 8 Q. And what did that entail? 9 A. Often, it -- creating, you know, 10 relationships with -- he did a lot with 11 international universities, so China was a 12 big thrust for the whole University at the 13 time. Or for at least our college, I should 14 say. 15 Uhm, having, you know, distinguished 16 people visit us to give colloquium weekly. 17 Okay? Is that enough? Okay. 18 Q. Sure. 19 A. Okay. 20 MR. MUNSHI: Rachel, it's 21 12:50. I just wanted to see if you 22 wanted to go now, in ten minutes, 23 fifteen minutes, whenever. 24 THE WITNESS: Yeah.</p>	<p style="text-align: right;">Page 171</p> <p>1 for identification.) 2 --- 3 BY MS. FENDELL-SATINSKY: 4 Q. The court reporter has given you a 5 document that's been marked as D-4. I'm 6 going to ask you the same first question, 7 which is whether you've ever seen this 8 before. 9 A. Yes, I have. 10 Q. And this -- 11 MR. MUNSHI: Hold on. 12 BY MS. FENDELL-SATINSKY: 13 Q. You have? 14 MR. MUNSHI: Well, actually 15 look through the whole document. 16 THE WITNESS: Oh, I'm looking 17 at this. You know, I just looked at 18 that first email. 19 BY MS. FENDELL-SATINSKY: 20 Q. So, I want you to tell me -- 21 A. Okay. 22 Q. -- if you've seen the document 23 before. 24 A. (Brief pause while reading.)</p>
<p style="text-align: right;">Page 170</p> <p>1 MS. FENDELL-SATINSKY: Yup. 2 I'll just ask a couple more 3 questions. 4 MR. MUNSHI: Sure. 5 MS. FENDELL-SATINSKY: And 6 then we'll take a break. 7 THE WITNESS: Yeah. It 8 doesn't feel finished yet. Okay. 9 BY MS. FENDELL-SATINSKY: 10 Q. Are you okay to keep going for a -- 11 A. Yeah. 12 Q. -- few more minutes? 13 A. Uh-huh. 14 Q. Uhm, did you view Dr. Wu as having an 15 important job? 16 A. Yes. 17 Q. And did you feel that you were 18 important, your role was important to him? 19 A. Yes, I did. 20 --- 21 (Whereupon, 12/31/12 email re 22 Happy New Year, Bates No. TEMPLE 23 UNIVERSITY (R.BRIGGS)-000363-368 AND 24 362, was marked as D Exhibit No. 4</p>	<p style="text-align: right;">Page 172</p> <p>1 Yes, I've seen it. 2 Q. Okay. So starting on the first page 3 of the document, is it accurate that this is 4 an email from you to Dr. Wu on December 5 31st, 2012? 6 A. That is correct. 7 Q. And tell me what this email -- and 8 you don't have to read it to me, but tell me 9 what this email is about. 10 A. He had been away for the holidays, 11 and I wanted to say happy holidays to him 12 and he asked me to come in on a practice 13 that -- he played the violin very well, so 14 he asked me to come in while he and 15 John Ikoniak, who was teaching; so I took 16 the pictures and sent it to him. 17 Q. Did you enjoy sitting in on that 18 practice? 19 A. Yes, I did. 20 Q. Uhm, did you sit in on other 21 practices or performances of Dr. Wu? 22 A. Performances, but not practices. 23 Q. And did you enjoy attending the 24 practices?</p>

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<p>1 A. I only went to one.</p> <p>2 Q. Okay.</p> <p>3 A. Okay.</p> <p>4 Q. And did you enjoy attending the</p> <p>5 performances?</p> <p>6 A. Yes.</p> <p>7 Q. And about how many performances did</p> <p>8 you go to?</p> <p>9 A. There were two he did for the</p> <p>10 department.</p> <p>11 Q. When were those performances?</p> <p>12 A. One was the holiday party, and that</p> <p>13 would have been the last year I was there.</p> <p>14 And he I think informally did it back in our</p> <p>15 lunchroom. We had like a lunch, common</p> <p>16 lunch area, and he played. And it was,</p> <p>17 like, during lunch.</p> <p>18 Q. And so you said that the one concert</p> <p>19 around the holidays was in the year before</p> <p>20 you left Temple, which was 2013?</p> <p>21 A. That would have been, yes.</p> <p>22 Q. And the other concert or performance?</p> <p>23 A. You know, I -- you know, I can't</p> <p>24 remember the day, but it was just at</p>	<p>1 Q. So you don't recall exchanging</p> <p>2 holiday or New Year's wishes with Dr. Wu</p> <p>3 other than this D-4?</p> <p>4 A. I'm not sure.</p> <p>5 ---</p> <p>6 (Whereupon, Temple University</p> <p>7 Rules of Conduct, Bates No.</p> <p>8 TEMPLE0148-164, was marked as D</p> <p>9 Exhibit No. 5 for identification.)</p> <p>10 ---</p> <p>11 BY MS. FENDELL-SATINSKY:</p> <p>12 Q. Ms. Briggs, the court reporter has</p> <p>13 given you a document that's been marked as</p> <p>14 D-5. I'm going to have the same first</p> <p>15 question for you, which is whether you've</p> <p>16 ever seen this document before.</p> <p>17 A. Yes, I have.</p> <p>18 Q. And is this Temple University's Rules</p> <p>19 of Conduct?</p> <p>20 A. Yes, it is.</p> <p>21 Q. Did you have access to this during</p> <p>22 your employment at Temple?</p> <p>23 A. Yes, I did.</p> <p>24 Q. I'd like you to turn to TEMPLE0152.</p>
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<p>1 lunchtime. He just happened to have his</p> <p>2 violin.</p> <p>3 Q. And then if you go to the last page</p> <p>4 of this exhibit.</p> <p>5 A. Uh-huh, okay.</p> <p>6 Q. There's an email from Dr. Wu to you,</p> <p>7 correct?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Is that a "yes"?</p> <p>10 A. Yes, it is.</p> <p>11 Q. And he says -- he's thanking you for</p> <p>12 your note, and he wishes you a Happy New</p> <p>13 Year too; is that right?</p> <p>14 A. That is correct.</p> <p>15 Q. And were these types of exchanges</p> <p>16 common with Dr. Wu around the holidays?</p> <p>17 A. It was common for me to do it, yes.</p> <p>18 Q. And --</p> <p>19 A. His, his response, sometimes. I</p> <p>20 mean, are you talking specifically holiday?</p> <p>21 Q. My question was about holidays, so my</p> <p>22 question was --</p> <p>23 A. This is, this is the only one I can</p> <p>24 remember, but...</p>	<p>1 A. (Witness complies with request.)</p> <p>2 Okay.</p> <p>3 Q. So the top of this page says, "Rules</p> <p>4 of Conduct," and then the second sentence</p> <p>5 says, "Temple expects its employees to abide</p> <p>6 by the following Rules of Conduct."</p> <p>7 Do you see that?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Is that a "yes"?</p> <p>10 A. Yes. I'm sorry.</p> <p>11 Q. That's okay.</p> <p>12 Did you understand that Temple</p> <p>13 expected its employees, including you, to</p> <p>14 abide by the bullet-pointed Rules of Conduct</p> <p>15 listed on TEMPLE0152?</p> <p>16 A. Yes.</p> <p>17 Q. If you go down to the bottom, it says</p> <p>18 "Disciplinary Procedure."</p> <p>19 A. Uh-huh.</p> <p>20 Q. Do you see that?</p> <p>21 A. Yes, I do.</p> <p>22 Q. And I'm going to the last para -- the</p> <p>23 last sentence of this paragraph. It says,</p> <p>24 "Repeated violations of work rules within a</p>

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<p>1 specific category over a 12-month period</p> <p>2 will lead to the next step in the</p> <p>3 progressive discipline process."</p> <p>4 Do you see that?</p> <p>5 A. Yes, I do.</p> <p>6 Q. Do you understand that?</p> <p>7 A. Yes, I do.</p> <p>8 Q. And did you understand that during</p> <p>9 your -- the time you worked at Temple?</p> <p>10 A. I understood that it was a</p> <p>11 possibility, yes.</p> <p>12 Q. Well, did you understand that</p> <p>13 violations of work rules within a specific</p> <p>14 category over a 12-month period would lead</p> <p>15 to the next step in the progressive</p> <p>16 discipline process?</p> <p>17 A. I didn't understand it to be true all</p> <p>18 the time, to be honest with you.</p> <p>19 Q. You told me earlier that you were on</p> <p>20 probation in 2012 and 2013 and 2014,</p> <p>21 correct?</p> <p>22 A. That is correct.</p> <p>23 Q. And why did you believe that you were</p> <p>24 on probation those years? I apologize if I</p>	<p>1 A. I did know that it was a policy, yes.</p> <p>2 ---</p> <p>3 (Whereupon, Temple University</p> <p>4 Policies and Procedures Manual memo,</p> <p>5 Bates No. BRIGGS 94-96, was marked</p> <p>6 as D Exhibit No. 6 for</p> <p>7 identification.)</p> <p>8 ---</p> <p>9 THE WITNESS: There's nothing</p> <p>10 more with this (indicating)?</p> <p>11 MS. FENDELL-SATINSKY: Not</p> <p>12 right now.</p> <p>13 THE WITNESS: Okay.</p> <p>14 MS. FENDELL-SATINSKY: You can</p> <p>15 put it to the side.</p> <p>16 BY MS. FENDELL-SATINSKY:</p> <p>17 Q. The court reporter has given you a</p> <p>18 document that's been marked as D-6.</p> <p>19 A. Uh-huh.</p> <p>20 Q. Is that a "yes"?</p> <p>21 A. Yes. I'm sorry. "Yes."</p> <p>22 Q. That's okay.</p> <p>23 Same first question to you is whether</p> <p>24 you've seen this document before.</p>
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<p>1 already asked you that.</p> <p>2 A. Uhm, the -- I don't -- what -- why do</p> <p>3 I understand I was? Because of a mistake,</p> <p>4 or one was oversleeping.</p> <p>5 Q. So did you understand that if you</p> <p>6 received a discipline you were on probation</p> <p>7 for a year following that discipline?</p> <p>8 A. I did. Yes, I did.</p> <p>9 Q. And if you turn to the next page,</p> <p>10 which is TEMPLE0153.</p> <p>11 A. Uh-huh.</p> <p>12 Q. Did you understand that there were</p> <p>13 four categories of disciplinary action --</p> <p>14 disciplinary violations?</p> <p>15 A. Yes, I did.</p> <p>16 Q. And those are Category A, B, C, and</p> <p>17 D, right?</p> <p>18 A. Yes.</p> <p>19 Q. And so did you understand that if you</p> <p>20 received, for example, a Category B</p> <p>21 disciplinary action, that if you received</p> <p>22 another Category B disciplinary action</p> <p>23 within 12 months it would lead to the next</p> <p>24 action in the process?</p>	<p>1 A. Yes, I have.</p> <p>2 Q. And if you look down at the Bates</p> <p>3 numbers in right-hand corner, you see it</p> <p>4 says "BRIGGS 94" on the first page?</p> <p>5 A. Yes, I do.</p> <p>6 Q. And I will tell you that means that</p> <p>7 this is a document that you or your attorney</p> <p>8 produced to us from you. Okay?</p> <p>9 A. Yes.</p> <p>10 Q. Did you have access to this document</p> <p>11 throughout your employment at Temple?</p> <p>12 A. Yes.</p> <p>13 Q. And did you understand this document</p> <p>14 during your employment at Temple?</p> <p>15 A. Yes.</p> <p>16 Q. And you understand that Temple</p> <p>17 prohibits discrimination and harassment,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 MR. MUNSHI: Objection to</p> <p>21 form.</p> <p>22 Go ahead.</p> <p>23 BY MS. FENDELL-SATINSKY:</p> <p>24 Q. You understood that was Temple's</p>

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<p>1 policy during your employment, correct?</p> <p>2 A. Yes.</p> <p>3 Q. I want to go back quickly to earlier</p> <p>4 we talked about Mr. Wacker.</p> <p>5 A. The --</p> <p>6 Q. You can put that aside --</p> <p>7 A. Oh, okay.</p> <p>8 Q. -- for now.</p> <p>9 A. Okay, okay.</p> <p>10 Q. And when we talked about Dr.</p> <p>11 Wacker --</p> <p>12 A. Mr. Wacker.</p> <p>13 Q. Mr. Wacker. I'm giving everybody</p> <p>14 additional titles or not enough titles.</p> <p>15 When we talked about Mr. Wacker, you</p> <p>16 gave me a list of things that Dr. Wacker</p> <p>17 asked you to do that you found morally</p> <p>18 objectionable, if not illegal.</p> <p>19 Do you remember that?</p> <p>20 A. Yes.</p> <p>21 Q. Why do you think Dr. -- let me ask it</p> <p>22 again.</p> <p>23 Why do you think Mr. Wacker asked you</p> <p>24 to do those things you identified as morally</p>	<p>1 A. I don't know.</p> <p>2 Q. Well, why do you believe he asked you</p> <p>3 to call Tanya's doctor's office?</p> <p>4 A. Because he didn't believe she was</p> <p>5 sick.</p> <p>6 Q. Why do you believe he asked you to do</p> <p>7 what your superiors tell you to do even if</p> <p>8 you struggle morally or ethically with it?</p> <p>9 A. Can you ask that question again?</p> <p>10 Q. Sure.</p> <p>11 Why do you believe Mr. Wacker told</p> <p>12 you to do what your superiors tell you to do</p> <p>13 even if you struggle morally or ethically</p> <p>14 with it?</p> <p>15 A. I don't know the answer to that</p> <p>16 question.</p> <p>17 Q. Why do you believe Mr. Wacker told</p> <p>18 you to try to find something to get rid of</p> <p>19 Ms. Lennon and not to help her with her</p> <p>20 computer?</p> <p>21 A. I don't know the answer to that</p> <p>22 question.</p> <p>23 Q. Why do you believe Mr. Wacker told</p> <p>24 you to submit expense reports that you found</p>
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<p>1 objectionable, if not illegal?</p> <p>2 MR. MUNSHI: Objection to</p> <p>3 form.</p> <p>4 BY MS. FENDELL-SATINSKY:</p> <p>5 Q. Do you understand my question?</p> <p>6 A. Yes, I do.</p> <p>7 Q. Okay.</p> <p>8 A. Uhm, I was surprised that he asked me</p> <p>9 to do it. It was against the law.</p> <p>10 Q. Why do you --</p> <p>11 A. And it --</p> <p>12 Q. Why do you think he asked you to do</p> <p>13 it?</p> <p>14 A. Because he told me he did not believe</p> <p>15 that Tanya was sick.</p> <p>16 Q. Why do you believe that he did not</p> <p>17 believe Tanya was sick?</p> <p>18 A. I don't know.</p> <p>19 Q. Why do you believe he told you to</p> <p>20 find something on Tanya to get rid of her?</p> <p>21 A. Because he thought she was lying.</p> <p>22 Q. Why do you believe he coached you</p> <p>23 before your meeting with an attorney about</p> <p>24 Tanya's lawsuit?</p>	<p>1 morally objectionable, if not illegal?</p> <p>2 A. Can I clarify something, please?</p> <p>3 Q. Sure.</p> <p>4 A. I asked -- would go to him if I</p> <p>5 thought that there might be some, and I'd</p> <p>6 say, "Is this okay to hit? Can I submit</p> <p>7 this?" So I would -- that's about the</p> <p>8 expense reports. There were times I was</p> <p>9 like, "Is this acceptable or not?"</p> <p>10 Q. Okay. And did you believe that there</p> <p>11 was a time he asked you to submit an expense</p> <p>12 report that you found morally objectionable,</p> <p>13 if not illegal?</p> <p>14 A. I did say -- I probably said I felt</p> <p>15 uncomfortable about it because I didn't</p> <p>16 understand that, but when he told -- he's</p> <p>17 the finance person and...</p> <p>18 Q. And did you feel uncomfortable with</p> <p>19 it because you don't have a finance</p> <p>20 background?</p> <p>21 A. No. I didn't -- whatever this</p> <p>22 request for just didn't...</p> <p>23 Q. So you didn't necessarily understand</p> <p>24 what the expense reports were for?</p>

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<p>1 A. Right; and if it was acceptable as a 2 reimbursable expense. 3 Q. Because you didn't understand 4 necessarily what the grants or -- 5 A. What can be -- 6 Q. -- projects entitled you to bill? 7 A. Yes. That is true. 8 Q. Why do you believe that Mr. Wacker 9 told you not to give Dean Sadeghipour 10 information? 11 A. He told me he didn't like him. 12 Q. Among other claims in your Complaint 13 in this action, you allege that Temple 14 discriminated against you because of your 15 age and sex, correct? 16 A. Uh-huh. 17 Q. Is that a "yes"? 18 A. Oh, I'm sorry. 19 Q. That's okay. Is that a "yes"? 20 A. Yes. 21 Q. Who do you believe discriminated 22 against you because of your age and your 23 sex? 24 A. Well, Dr. Wu's comments about my age</p>	<p>1 discriminated against you because of your 2 age and your sex, and you said Dr. Wu. 3 A. Specifically, yes. 4 Q. Okay. Anyone else aside from Dr. Wu? 5 A. No. 6 Q. Your Complaint also alleges that 7 Temple subjected you to a hostile work 8 environment -- 9 A. Yes. 10 Q. -- correct? 11 A. Yes. That is the true. 12 Q. Who do you believe created a hostile 13 work environment? 14 A. Greg Wacker; Drew DiMeo; Dr. Wu. 15 Q. And how do you believe Mr. Wacker 16 created a hostile work environment? 17 A. By threatening me if I didn't 18 cooperate with him that he would fire me. 19 Q. When did he do that? 20 A. It was about Judy, helping Judy out. 21 Q. Did he ever threaten you on any other 22 occasion? 23 A. My first day in the dean's office, 24 but that's a long time ago.</p>
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<p>1 on different -- three different occasions. 2 Q. And I'm just going to -- 3 A. Why are you looking -- 4 Q. -- for a second, because Mr. Munshi 5 is, is nodding his head. 6 MR. MUNSHI: Oh, I'm -- I was, 7 I was rocking. I didn't, I didn't 8 mean to -- 9 THE WITNESS: Oh, okay. 10 MR. MUNSHI: -- do anything. 11 I was just rocking back and forth. 12 Sorry. I didn't realize. 13 BY MS. FENDELL-SATINSKY: 14 Q. So, you've identified Dr. Wu. 15 A. Now I forgot the question. 16 Q. Sure. Let me ask it again. 17 So among other claims in your 18 Complaint, you allege that Temple 19 discriminated against you because of your 20 age -- 21 A. Right. 22 Q. -- and your sex, correct? 23 A. Yes. 24 Q. And I asked you who do you believe</p>	<p>1 Q. And the first day in the dean's 2 office, was that when you worked for Dean 3 Nicholson? 4 A. Yes, uh-huh. 5 Q. And what did he threaten you with in 6 regards to that occasion? 7 A. He stood over my desk when everyone 8 was gone and told me that I probably 9 shouldn't mess with him, because I wouldn't 10 win. And I said to him, "I won't." 11 Q. Any other way that you believe 12 Mr. Wacker created a hostile work 13 environment for you? 14 A. By not responding to my, my requests 15 for help, mediation, something between 16 Dr. Wu and myself. 17 Q. Did he assign, uhm, Drew DiMeo to 18 that role? 19 A. It wasn't happen -- yes, he did, 20 but... 21 Q. So he did respond to your request, 22 just not in a way that you were satisfied 23 with? 24 A. I didn't request Drew to be in on the</p>

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<p>1 meetings, if that's what you mean.</p> <p>2 Q. You requested that somebody be in</p> <p>3 that meeting?</p> <p>4 A. From H.R. or from Sandy Foehl,</p> <p>5 someone who -- from the H -- Human Resources</p> <p>6 who would help me.</p> <p>7 Q. Did you specifically request someone</p> <p>8 from Human Resources?</p> <p>9 A. Yeah, uh-huh.</p> <p>10 Q. Did you do that in an email?</p> <p>11 A. Yes.</p> <p>12 Q. And when did you do that?</p> <p>13 A. Multiple occasions. Throughout the</p> <p>14 last, like, last four months that I was</p> <p>15 there, I, I felt something was coming.</p> <p>16 Q. When you say you felt something was</p> <p>17 coming, what do you mean?</p> <p>18 A. Well, I was being written up for</p> <p>19 things that I felt were -- that I was</p> <p>20 singled out. No one else was written up for</p> <p>21 anything, so I just felt very singled out.</p> <p>22 Q. Did you feel singled out by</p> <p>23 Mr. Wacker?</p> <p>24 A. In -- yes.</p>	<p>1 A. By being involved. I don't know why</p> <p>2 he was involved in my -- I wasn't in his</p> <p>3 office. I don't know what his involvement</p> <p>4 was.</p> <p>5 I mean when I was with Dr. Wu. Prior</p> <p>6 to that, I was in his office.</p> <p>7 Q. Okay. Anything else?</p> <p>8 A. Fear. I saw what happened, what he</p> <p>9 wanted me to do to one person, another</p> <p>10 person, and I was, I was fearful that it</p> <p>11 would happen to me.</p> <p>12 Q. So you were fearful that he would</p> <p>13 want to do what?</p> <p>14 A. To find a reason to get -- you know,</p> <p>15 to, to discipline me.</p> <p>16 Q. Why did you think he wanted to</p> <p>17 discipline you?</p> <p>18 A. I don't know.</p> <p>19 Q. Anything else Mr. Wacker did that you</p> <p>20 thought created a hostile work environment?</p> <p>21 A. Yeah. He and Dr. Wu would meet</p> <p>22 behind my -- you know, without me.</p> <p>23 Q. Okay. Anything else?</p> <p>24 A. Not that I can -- no.</p>
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<p>1 Q. And why do you think Mr. Wacker</p> <p>2 singled you out?</p> <p>3 A. I don't know the answer to that</p> <p>4 question.</p> <p>5 Q. Uhm, any other way in which you</p> <p>6 believe Mr. Wacker created a hostile work</p> <p>7 environment for you?</p> <p>8 A. By, uhm, reporting -- having Drew,</p> <p>9 his, his report, sit in our meetings and</p> <p>10 then report back to him. He always knew</p> <p>11 what happened.</p> <p>12 Q. Any other way in which you believe</p> <p>13 Dr. Wacker created a hostile work</p> <p>14 environment for you?</p> <p>15 A. He just -- he would call me and say,</p> <p>16 "I just want you to just do whatever he</p> <p>17 says. I'm tired of him coming over here,"</p> <p>18 those kind of things. It just was I felt</p> <p>19 stressed all the time.</p> <p>20 Q. Do whatever who says?</p> <p>21 A. Dr. Wu.</p> <p>22 Q. Okay. And anything else that</p> <p>23 Dr. Wacker did that you believe created a</p> <p>24 hostile work environment for you?</p>	<p>1 Q. You gave me a list of things that you</p> <p>2 claim Mr. Wacker did to you that you believe</p> <p>3 created a hostile work environment, correct?</p> <p>4 A. Correct.</p> <p>5 Q. Why do you believe Dr. -- I did it</p> <p>6 again.</p> <p>7 A. Yeah, I know.</p> <p>8 Q. Why do you believe Mr. Wacker did the</p> <p>9 things you allege he did?</p> <p>10 A. I believe it began with the lawsuit</p> <p>11 from Tanya, Tanya Hunnewell.</p> <p>12 Q. So you believed that Dr. Wacker --</p> <p>13 MR. MUNSHI: Mister.</p> <p>14 MS. TRACHTENBERG: Mister.</p> <p>15 MS. FENDELL-SATINSKY: Mister.</p> <p>16 See.</p> <p>17 MS. TRACHTENBERG: Just call</p> <p>18 him "Wacker."</p> <p>19 MS. FENDELL-SATINSKY: That</p> <p>20 would be easier --</p> <p>21 THE WITNESS: Call him "Greg."</p> <p>22 MS. FENDELL-SATINSKY: -- for</p> <p>23 everyone. I'll call him "Greg."</p> <p>24</p>

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<p style="text-align: right;">Page 193</p> <p>1 BY MS. FENDELL-SATINSKY: 2 Q. You believe, uhm, that Greg treated 3 you the way he did because of what related 4 to Tanya? 5 A. I feared that he would. I didn't 6 know that he would. 7 Q. Okay. 8 A. Yeah. 9 Q. So my question was: Why do you 10 believe Greg did the things that you 11 identify that you believe created a hostile 12 work environment? 13 A. Out of fear of retaliation. 14 Q. Okay. So you believe that Greg did 15 the things you identified as doing which you 16 believe created a hostile work environment 17 to instill fear in you? 18 A. Yes. 19 Q. Any other reason? 20 A. He told me he could get rid of me in 21 a minute. 22 Q. Okay. And why do you believe he told 23 you he could get rid of you any (sic) 24 minute?</p>	<p style="text-align: right;">Page 195</p> <p>1 but under Greg Well's -- Greg Wacker's 2 supervision. 3 Q. And other than the mornings meetings 4 with Mr. DiMeo, did Mr. DiMeo do anything 5 else that you believe created a hostile work 6 environment for you? 7 A. Yes. His -- he was unwilling to 8 believe me or trust me. 9 Q. Anything else? 10 A. No. 11 Q. Why do you believe that Mr. DiMeo was 12 asked to sit in on your morning meetings 13 with Dr. Wu? 14 A. I don't know. 15 Q. Why do you believe Mr. DiMeo was 16 unwilling to believe or trust you? 17 A. I don't know. 18 Q. You also said that Dr. Wu created a 19 hostile work environment for you; is that 20 correct? 21 A. Yes, he did, uh-huh. 22 Q. Yes? 23 A. Yes, he did. 24 Q. Okay. What did Dr. Wu do that</p>
<p style="text-align: right;">Page 194</p> <p>1 A. I don't know the answer to that 2 question. 3 Q. Okay. You also told me that you 4 believe Drew DiMeo subjected you to a 5 hostile work environment, correct? 6 A. Yes. 7 Q. What did Drew DiMeo do that you 8 believe made a hostile work environment? 9 A. He -- in our morning meetings, it was 10 really he and Dr. Wu. And this was three 11 days a week they would meet with me and 12 just -- it wasn't about what we're going to 13 do. It's going to be "what did you do 14 wrong." And Greg, I never would have, you 15 know, a chance to defend, to say "that's not 16 true" or... 17 Drew, I felt like Drew was my friend 18 for a while, and -- and that changed. 19 Q. And so when that changed, did you 20 feel at that point that he started to create 21 a hostile work environment for you? 22 A. The hostile work environment created 23 started when he was asked to sit in on the 24 meetings with Dr. Wu and I in the morning</p>	<p style="text-align: right;">Page 196</p> <p>1 created a hostile work environment for you? 2 A. He would -- 3 MR. MUNSHI: After we answer 4 that, can we either take five or 5 take lunch? Because we're getting 6 into big, big things now. 7 MS. FENDELL-SATINSKY: Yup. I 8 have one question after this. 9 MR. MUNSHI: We've been going 10 like an hour-and-a-half. 11 THE WITNESS: Okay. Now -- 12 BY MS. FENDELL-SATINSKY: 13 Q. Are you okay to continue? 14 A. I want you tell me what the question 15 was again. 16 Q. Sure. 17 A. I'm sorry. 18 Q. Are you okay to continue or do you -- 19 A. Oh, I am. 20 Q. -- need a break? 21 A. Sure, yeah. 22 Q. Okay. So my question to you was 23 that: You told me that Dr. Wu created a 24 hostile work environment for you, correct?</p>

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